Integrity Academy

EQUITY POLICY

Version 1.1
2016

CONTENT

EQUITY POLICY

1.   **POLICY PARTICULARS**

        DATE OF APPROVAL BY EMPLOYMENT EQUITY COMMITTEE: 16 January 2016
        DATE OF APPROVAL BY INSTITUTIONAL FORUM: 23 January 2016
        DATE OF APPROVAL BY COUNCIL: 19 February 2016
        COMMENCEMENT DATE: 1 April 2016
        REVISION HISTORY: The policy was first approved as the Employment Equity
        Policy on 16 January 2016 and which has subsequently been revised to this Equity
        Policy.
        REVIEW DATE: Every 3 years, by June of the relevant year.
        PREVIOUS REVIEW: 16 January 2016
        LAST REVIEW: 16 January 2016
        POLICY LEVEL: All Staff and Students

        RESPONSIBILITY:
        Implementation and Monitoring:
- The Chief Executive has prime responsibility for ensuring the implementation of the policy and the Employment Equity Plan in all respects. The Academic Manager: Integrity Academy will assist the Chief Executive in this regard;
- The Equity Committee, as a joint Senate and Council committee, is tasked by Council to assist with interpretation of the policy, to determine the Employment Equity Plan, to monitor adherence to the policy as well as the implementation of the Employment Equity Plan and to propose changes to the policy and plan, where necessary;
- The Heads and their respective Faculty Boards are responsible for: driving changes related to equity in terms of the academic culture and practices of the institution, reporting to the Equity Committee on the progress made, recommending changes where necessary to the Equity Committee and contributing to the institutional plans and documentation submitted to the Department of Education;
- Heads of Divisions are responsible for: driving changes related to equity in terms of the institutional culture and practices of the institution in their respective divisions, reporting to the Equity Committee on the progress made and recommending changes where necessary to the Equity Committee;
- The Director and managers of the Human Resources Division are responsible for: driving the changes related to employment culture and practices as necessitated by the policy and the Employment Equity plan, reporting to the Equity Committee on the progress made, recommending changes where necessary to the Equity Committee and ensuring that the annual Employment Equity Report and Plan detailing employment practices is written and submitted to the Department of Labour in October of each year; and
- Heads of Departments and managers are responsible for implementing the policy and plan at the departmental or divisional level.
- The Committee structure and the Management Accountability structure can be found in Annexures 1 and 2.

Review and Revision of the Policy:
- The Equity Committee.

2.   POLICY STATEMENT

2.1   POLICY DECLARATION
The Integrity Academy strives to be an outstanding internationally-respected academic institution which proudly affirms its African identity and which is committed to democratic ideals, academic freedom, rigorous scholarship, sound moral values and social responsibility (Vision and Mission Statement).

The Academy's African identity will be affirmed through: its commitment to the social and economic transformation of South Africa; its acknowledgement of the problems created by the legacy of apartheid; its undertaking to reject all forms of unfair discrimination; its dedication to the implementation of appropriate corrective measures to redress past imbalances; and its success in realising diversity amongst students and staff (adapted from the Vision and Mission Statement).

The Integrity Academy believes that through affirming its African identity it will be better placed to serve and contribute to South Africa and the international community, now and in the long-term. The institution's strength will be realized and its reputation secured through its commitment to both equity and quality.

2.2   POLICY OBJECTIVES
This policy aims to address issues of equity in three key areas.

2.2.1   Academic arena
Governed and influenced by changes in the higher education arena (e.g. Higher Education Act of 2000, 1997 White Paper on Education, National Plan for Higher Education) and as evidenced in the information required by the Department of Education (as with the 2004-2006 institutional plans), Integrity Academy is required to address issues of equity within the academic arena. This demands consideration of all aspects of teaching, learning and research, student enrolment, throughput and output, student equity, staff equity and the transformation of the institutional culture.

2.2.2   Employment arena
The Employment Equity Act (of 1997) requires the Integrity Academy to engage in certain employment equity practices with the objectives of eliminating unfair discrimination and implementing positive measures to address the effects of past discrimination against designated groups.

2.2.3   Institutional culture
Students and staff are both affected and affect the institutional culture particularly given the residential nature of the Integrity Academy. The term "institutional culture" refers to the general ethos and the dominant value systems of an institution as embedded and embodied in the structures through which institutional life is pursued such as academic departments and schools, teaching and learning systems and practices, research systems and practices, administrative systems, governance structures and rules or codes of conduct. As regards the specific practices associated with the culture of Integrity Academy, the institution has made a commitment to observing the principles of corporate governance as captured in the King Code of Corporate Practice and Conduct.

In addressing equity in these three areas, Integrity Academy does more than simply recognise the importance of meeting the legal requirements. The Integrity Academy

believes that the moral, social and economic imperatives of pursuing an equity agenda are more compelling.

Within the three equity arenas, the policy aims to build a representative staff and student body with a strong sense of community, who, in their everyday interactions with each other and the external community, actively promote and demonstrate the shared values of tolerance, understanding, and positive relations.

In building a representative staff and student body, the following are required and are therefore, also aims of the policy:
- The elimination of any unfair discrimination in the practices, customs and traditions of the institution;
- The redressing of imbalances caused by past practices of unfair discrimination; and
- Actively managing the diversity of students and staff.

2.3   DEFINITIONS

Absolute barriers:	The exclusion of a particular group of individuals from participating in development opportunities or applying for employment or promotion opportunities on the basis of any arbitrary demographic factor, such as race or gender.
Academic arena:	Practices associated with student access/enrolment, throughput and the teaching, learning and research environment.
Corporate governance:	Holding a balance between economic and social goals and between individual and communal goals where the aim is to align as nearly as possible the interests of individuals, corporations and society." [1]
Designated groups:	Blacks (Africans, Coloureds, Indians), women and the disabled as per the Employment Equity Act (1997).
Employment arena:	Practices associated with the employment, development, management and termination of staff as well as issues relating to the culture of the institution.
Employment practices:	Policies and practices used by the institution to attract; select; train and develop; promote; compensate and discipline staff; establish and define jobs; and determine the conditions of employment at the workplace.
Fair discrimination:	The process of objective differentiation e.g., choosing one candidate in an objective selection process, promoting one person before another based on a fair evaluation using appropriate criteria or paying one person more than another based on an objective evaluation of the job being done. Fair discrimination can also refer to legislated discrimination such as in the case of affirmative action

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[1] (Adapted from Cadbury 1999 in World Bank Report on Corporate Governance as quoted in the King Code of Corporate Practice and Conduct).

measures where race and gender are taken into consideration when making employment decisions.

Institutional Culture: "Way things are done" within an organisation specifically the traditions, customs, values, and shared understandings that underpin the decisions taken, the practices engaged in and those practices that are rewarded and supported.

Managers: All employees whose duties include managerial and/or supervisory functions.

Participative Management: Style of management that emphasises employee participation in setting goals, solving problems, taking decisions and designing and implementing change, particularly in relation to those decisions or changes that will impact on them.

Qualitative targets: Initiatives that will be undertaken to change the institutional culture, to address particular past practices or to implement new initiatives.

Quantitative targets: Numerical targets associated with changing the demographic composition of students and staff to more closely represents the national demographic profile.

Reasonable accommodation: Changes required in order to accommodate an individual with a disability. What is reasonable can be contrasted to what is regarded as unjustifiable hardship where the accommodation requirements would incur unreasonable costs and/or inconvenience for the employer/institution and/or fellow employees/students.

Senior Management: Directors of Support Staff Divisions, Head of Students, Registrar, and Registrar of Finance.

Support staff: Staff who are not directly involved with teaching and/or research and includes those staff who support the academic staff in their teaching and research activities. Historically, this group of staff were referred to as non-academic staff.

Throughput: Success rates of students and whether or not students complete the degree/certificate programme in the required time.

Unfair discrimination: Unfair discrimination must be contrasted to fair discrimination (see definition above). There are two types of unfair discrimination. Direct unfair discrimination is discrimination based on arbitrary reasons including but not limited to race, gender, sex, pregnancy, marital status, ethnic or social origin, colour, sexual orientation, age, disability, religion, conscience, belief, culture, language and birth. This kind of discrimination is usually intentional, overt and easy to identify. Indirect unfair discrimination is the

result of particular practices that result in adverse impact on a particular demographic group. Such discrimination is usually unintentional, covert and difficult to identify.

3   POLICY IMPLEMENTATION

3.1   THE STRATEGIES, ACTIONS, AND PROCESSES BY WHICH THE OBJECTIVES OF THE POLICY WILL BE ACHIEVED:

3.1.1   PRINCIPLES GOVERNING POLICY IMPLEMENTATION:
The following principles will guide the implementation of specific equity initiatives:

3.1.1.1   Strategic Nature of Equity
Equity must be recognised as an integral component of the future of the Academy. Diversity will make Integrity Academy a more dynamic, stronger and more effective institution. This needs to be understood and accepted by staff and students.

3.1.1.2   Dual focus of quality and equity
Integrity Academy believes that the goals of quality and equity are not mutually exclusive but that diversity can strengthen the quality of Integrity Academy. Whilst it is a common perception that the goals of quality and equity are in conflict with each other and that the pursuit of an affirmative action agenda will inevitably lead to the dropping of standards, the Academy believes that only certain forms of affirmative action and equity strategies (e.g. tokenism and window dressing) lead to this. Integrity Academy is committed to finding ways to ensure that equity and diversity strengthen the institution.

3.1.1.3   Change and a Culture of Inclusivity
To ensure the effective implementation of the policy, change in the culture, values and practices of the Academy are necessary. Such change recognises that certain inequities do exist within Integrity Academy as a result of Apartheid practices and that these have contributed to a culture that is experienced by some staff and students as alienating. Integrity Academy should ensure that equity initiatives develop and support a culture where all staff and students feel welcome and valued. This includes vehemently rejecting any absolute barriers to the inclusion, development and exclusion of certain groups of students as well as the employment, promotion or development opportunities of certain groups of staff.

3.1.1.4   Consistent behaviour
The consistent treatment of staff and students, irrespective of status, seniority, rank, job title, sex, gender, sexual orientation, race, ethnic or social origin, age, belief, conscience, language, marital status, disability and religion is the basis of establishing an inclusive culture. Integrity Academy is committed to ensuring that all members of the Academy community are treated with respect and courtesy. Furthermore, Integrity Academy is committed to ensuring the consistent application and implementation of policies and practices.

3.1.1.5   Responsibility, Commitment and Accountability
Each member of the Integrity Academy community contributes to the success of equity initiatives by, at the very least, contributing to an environment that is welcoming and supportive of new staff and students, irrespective of race, gender, religion, sexual orientation, national or ethnic status, home language, disability etc. A commitment to contributing to the success of equity at Integrity Academy is required from staff and

students. The Academy must hold management accountable for making reasonable progress towards achieving its equity goals. The equity responsibilities of management and the mechanisms for ensuring that these responsibilities are met need to be articulated.

3.1.1.6   Communication

Communication is critical to the pursuit of an equity agenda and in establishing an inclusive institutional culture. Integrity Academy is committed to two-way communication where staff and students are consulted regarding decisions that impact on them. In addition, Integrity Academy must ensure vigorous and ongoing communication about progress made and future equity plans (including targets set). Feedback and input from staff and students is also critical to the success of equity initiatives. The language policy of the Academy will be adhered to in all communications.

3.1.1.7   Need for Flexibility and Fairness

In the setting of both qualitative and quantitative targets, Integrity Academy rejects any form of quotas that are rigidly enforced as this implies that the Academy operates in a stable environment with knowledge of the future and guaranteed resources. As this is not the case, flexibility in predicting its future, is critical to the planning of equity. Integrity Academy recognizes the need to plan and set goals or targets in relation to equity. The Academy will make every effort to adequately resource this policy. However, the fact that resources are limited must be kept in mind.

3.1.2   STRUCTURES:

3.1.2.1   Equity Committee

The Equity Committee will be responsible for driving institutional culture change through:

- ensuring that equity issues receive consideration within the various committee structures of Integrity Academy, where relevant e.g. Appointments Committees, Academic Planning, Teaching and Learning Committee, Gender Action Forum, Student Services Council, Board of Residences, etc.;
- recommending changes to current practice, in terms of academic, student and staff matters, in line with the policy or development strategies to ensure implementation of the policy;
- calling for reports on issues of concern and/or progress made in implementing such plans and strategies and reviewing reports;
- discussing problems identified in the implementation of such plans and strategies;
- approving any plans proposed consistent with the policy which further the aims of the policy;
- consulting on any documentation to be submitted to parties external to the institution e.g. government departments, where equity matters are to be reported on;
- reviewing evaluations made of practices and consulting on the changes required;
- reviewing the policy every 3 years and recommending changes, if necessary;
- reporting to staff, management, Senate and Council on these matters; and
- ensuring the provision of appropriate mechanisms to manage grievances relating to equity including issues of harassment, racism, sexism and other forms of prejudice.

The Equity committee will include:
- Chief Executive Officer (ex officio);
- Academic Head: Integrity Academy as Chairperson;

- Head of Students;
- Director of Human Resources;
- 1 representative, elected from amongst senior management;
- 1 Manager of the Human Resources Division (Employee Administration, Employee Relations, Human Resources Development, Recruitment and Selection);
- 1 representative, elected from amongst the Heads and Deputy Head of Humanities;
- Two members elected by Council;
- 1 lecturer representative, elected from amongst the lecturing staff;
- Two student representatives;
- Given that the Equity Committee will also serve as the institution's employment equity committee, as required by the Employment Equity Act, attention must be paid to having representatives from each of the designated groups as well as for the different occupational categories. Therefore, the committee will have the power to co-opt other members.

All members of the committee will have equal voting rights.

The committee shall meet quarterly. Much of the work of the committee will take place in working groups.

3.1.3 IN THE ACADEMIC ARENA: STRATEGIES, ACTIONS AND PROCESSES

Equity issues in the academic arena concentrate on issues of access, throughput and diversity in terms of the teaching, learning and research environment.

3.1.3.1 Recruitment of Students and Access

Integrity Academy is committed to changing the demographic profile of students at the institution to more accurately reflect that of the population of South Africa. It strives to ensure equitable access across the different population groups and recognizes that past Apartheid practices have adversely impacted on designated groups' access to higher education. The institution's proposed Admissions Policy will provide more detail of the strategies used to achieve this but these currently include school visits by Integrity Academy's recruitment officer, facilitating campus visits by students, providing student financial aid, and providing a system of alternative access for students for whom the "points" system is not a good predictor of likely success at Integrity Academy.

Integrity Academy recognizes that its success in recruiting students from the designated groups and achieving a satisfactory throughput (see 3.1.3.2) of such students, is significantly influenced by the secondary schooling environment. Institutional equity strategies to address this include improving the teaching of maths and science in schools.

3.1.3.2 Throughput

Integrity Academy closely monitors success rates across the different population groups with the objective of increasing success rates particularly amongst those students from the designated groups. Strategies used to improve the success rates include the small group tutorial system, mentoring schemes, and the provision of foundation programmes. The holistic approach to academic development focuses on the quality of teaching on offer at Integrity Academy and not only on a student's possible lack of familiarity with academic culture.

3.1.3.3 Diversity in terms of teaching and learning

In its teaching and learning policies[2], including curriculum development, assessment and evaluation, Integrity Academy recognizes the need to accommodate learner diversity, in particular linguistic and cultural diversity.

3.1.4 IN THE EMPLOYMENT ARENA: STRATEGIES, ACTIONS AND PROCESSES

The achievement of employment equity requires a four-pronged strategy:
- the elimination of unfair discrimination and harassment;
- affirmative action to redress imbalances of the past;
- management of diversity as the staff profile changes; and
- effective dispute resolution.

Achieving these strategies requires the determination of an Employment Equity Plan and detailed record-keeping of the progress made.

3.1.4.1 Unfair Discrimination and Harassment

Integrity Academy rejects all forms of unfair discrimination and harassment, recognising these as hindering the development, integration and thus full employment of all people within the institution. Achieving equity begins with the elimination of unfair discrimination and any systemic discrimination resulting in adverse effect on designated groups.

Integrity Academy is committed to eliminating such discrimination through the:
- ongoing evaluation of employment systems and practices to ensure that they meet the basic standards set by the labour legislation;
- communication of employment practices;
- training of management and relevant staff in ensuring the implementation of Human Resources policy/procedures and adherence to legal and organisational requirements;
- consistent and non-arbitrary application of these policies and procedures;
- keeping of records and statistics to detect any deviation from policy;
- taking of corrective action where necessary; and
- provision of a grievance procedure to deal with complaints or concerns of this nature.

3.1.4.2 Affirmative Action

Achieving equity also includes redressing past imbalances and ensuring equality of opportunities. Integrity Academy recognises that for a variety of social, political and economic reasons, people from designated groups seldom have had the same access to opportunities as white males. Integrity Academy will endeavour to overcome these imbalances through the implementation of specific measures for members of designated groups including:
- the implementation of development programmes providing opportunities to gain critical work experience e.g. Mellon Foundation Programme for Accelerated Development and the support staff internship programme;
- the provision of support and guidance to academic staff in applying for personal promotion; and
- in the case of support staff posts, the provision of promotional opportunities for suitable staff as defined in the Recruitment and Selection Policy for Support Staff Posts.

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[2] Policy on Evaluation of Teaching and Courses, Policy on Curriculum Development, Policy on Assessment of Student Learning

3.1.4.3   Managing Diversity

Integrity Academy is committed to building and managing a diverse workforce, believing that the environment and work of the institution will be enhanced through the selection, development and promotion of a wide range of individuals. An increasingly diverse staff and student body demands that the institution regularly and critically reviews its culture and its "way of doing things" to ensure that practices, traditions and customs are not alienating to some staff and/or students. Strategies to achieve this are discussed further under section 3.15.

3.1.4.4   Dispute Resolution

Integrity Academy recognizes the importance of dispute resolution in promoting fairness, equity, management of diversity and an inclusive culture. The institution commits itself to:

- Providing formal structures such as the grievance procedures, mediation facilities and disciplinary procedures to ensure the resolution of disputes; and
- Facilitating the access of students and staff to such structures.

3.1.4.5   Employment Equity Plan

The realization of the above strategies and the implementation of the policy will be enforced through the determination and implementation of an overall five- year institutional plan.

This plan will include:

- determining numerical goals or targets for improving the demographic profile of staff at each occupational level and category;
- determining objectives for the implementation of specific employment equity initiatives as regards recruitment, selection, development, retention, pay equity etc.;
- setting a timetable for the achievement of these goals and objectives; and
- assigning accountability to persons responsible for the implementation of the plan.

Record Keeping

In order to monitor the implementation and effectiveness of employment equity initiatives, records must be kept of all relevant employment practices. At a minimum, such records must include the data required by the Department of Labour for inclusion in the annual Equity Report but may include additional records at the discretion of the Equity Committee.

3.1.5   INSTITUTIONAL CULTURE: STRATEGIES, ACTIONS AND PROCESSES

Integrity Academy strives to be a community where all staff and students can feel welcome, respected, appreciated and valued.

This is to be achieved through:

3.1.5.1   Ongoing promotion of equity and transformation issues within the institution within a variety of forums for both staff and students;

3.1.5.2   Striving for diversity and representivity in the key decision-making bodies of Integrity Academy, recognizing that such diversity can enhance the decisions taken regarding the future of Integrity Academy and that such representivity contributes to staff having a sense of community within Integrity Academy;

3.1.5.3   Ensuring transparency, accountability and openness in decision-making and management as well as an openness to questioning the status quo, to

reviewing systems and the beliefs that underpin such systems, and where beneficial to Integrity Academy and staff, to embracing new ways and practices. Such values and behaviours are recognized as critical in the building of a culture of inclusivity and a sense of community;

3.1.5.4 Promoting multilingualism and sensitivity in language usage, recognizing the cultural and religious significance of various foreign languages and advancing the academic viability of the three main languages of the in South Africa (isiZulu, Afrikaans and English);

3.1.5.5 Showing respect and tolerance for different cultural and religious practices, for example: requests for special religious holidays are accommodated and respected in terms of normal leave procedures, legislation and national trends and exploring whether current institutional cultural practices are alienating to particular cultural and religious groups in Integrity Academy;

3.1.5.6 Demonstrating tolerance and understanding for people with disabilities. Integrity Academy will proactively manage the needs of these individuals as regards access to facilities and in the case of staff, to their work environment and in the case of students, to their study and/or residence environments. Integrity Academy recognizes that there is a need for reasonable accommodation for persons with disabilities;

3.1.5.7 Ensuring the use of a participative management style, at all levels, in dealing with staff and students;

3.1.5.8 Ensuring that managers have the necessary skills to make the best use of a diverse staff to the advantage of the institution and to the benefit of those individuals through ensuring that all managers attend training on the implications of the policy in particular their responsibilities regarding implementation;

3.1.5.9 Ensuring that staff and students have the necessary skills to manage diversity effectively in their everyday lives through ensuring that all students and staff attend diversity awareness training;

3.1.5.10 Understanding the attitudes, perceptions and experiences of staff and students at Integrity Academy as regards the culture of Integrity Academy and whether staff and students experience a sense of community. One way of establishing such attitudes, perceptions and experiences would be to access the reasons for all voluntary terminations and, where necessary, to conduct exit interviews with staff. Other mechanisms include conducting research or climate surveys with staff and students; and

3.1.5.11 Ensuring the provision of dispute resolution mechanisms to deal with incidents of harassment and prejudice.

3.1.6. RELATED POLICIES AND PROTOCOLS

The relationship between the policy and other policy and protocol documents needs to be borne in mind at all times.

Current documentation includes:
- Appointment Equity Protocol;
- Policy on the Assessment of Student Learning;
- Policy on Curriculum Development;
- Employment Protocol for Support Staff Internship Programme;
- Policy on the Evaluation of Teaching and Courses;
- Grievance Procedures;
- Harassment Policy and Procedures;
- HIV Infection and AIDS Policy;
- Ill-health Policy for Staff;

- Language Policy;
- Recruitment and Selection Policy for Academic Staff;
- Supervision (research) Policy;
- Staff Development Policy;
- Vision and Mission Statement.

Future documentation will include:
- Admissions Policy;
- Disability Policy for Students and Staff;
- Recruitment and Selection Policy for Support Staff.

3.2   REVIEW PROCEDURE

3.2.1   The Equity Committee shall review the policy every 3 years, by June of the relevant year.

3.2.2   Any proposed changes to the policy would need to be referred to the Institutional Forum for comment and then to Senate and Council for approval.

3.2.3   As and when the policy is revised, the latest copy of the policy will be widely distributed by the Committee Secretariat to all Heads of Departments and Divisions who shall be responsible for communicating changes to the policy to staff in those departments/divisions. The Committee Secretariat will also ensure that the web version remains updated.

Annexure 1: Management Accountability (**ADMINISTRATIVE REPORTING STRUCTURE)**

CEO

1.1 **Academic Manager: Integrity Academy**

1.1.1 **Director (Estates)**

Building Maintenance
Electrical Maintenance
Engineering Maintenance
Transport
Capital Projects
Campus Protection
Fire Prevention
Grounds & Gardens
Safety

1.1.2 **Director (Human Resources)**

Recruitment and Selection
Remuneration
Job Evaluation
Staff Development
Industrial relations
Pension & Provident Funds Administration
Medical Aid & Group Life Insurance
Leave

1.1.3 **Director (Academic Development Centre)**

1.1.4 **Librarian**

Public Services
Collections + Technical Services
Library + Historical Resources
Branch Libraries

1.1.5 **Head of Students**

Residences
Students Representative Council
Sports Administration
Student & Function Catering
Housekeeping
Meal booking System
Conference Organization

Central Cleaning & Janitoring

Director (Information Technology 1.1.6 Division)

Academic Manager: IA

1.2 **Registrar**

Secretariat: Council
General Administration
Admissions
Examinations
Faculty Administration
Student Records
Integrity Academy Records
Student Recruitment
Financial Aid
Sanatorium
Student Counselling & Guidance

1.3 **Registrar (Finance)**

Financial Accounting
Fees
Information Systems Development
Payroll
Buyers
Stores
Insurance
Housing
Printing
Mail Services
Research Administration

1.4 **Director Development**

Capital Development
Alumni Relations
Research & Information

1.5 **Director Communications**

Strategic Market Planning
External & Internal Communications
Design & Production Services
Campus Events

1.6 **Director Academic Planning & Quality Assurance**

Planning
Quality Assurance

	Short Course Management

1.7   **Director, Lynnwood Glen, Campuses**

1.8   **Head of Research**

	Research Administration Income Generation Programme