Public Sector Equality Duty Report

December 2025

H. Clarke

Foreword

Woking College is a Sixth Form College which provides a range of Level 3, (A Level and BTEC); Level 2 courses (English, Maths and vocational Level 2 courses); and Level 1 courses for 16-19 year old sixth form students. Students also participate in a range of over 75 enrichment activities to enable additional academic, sporting, cultural and personal development opportunities.

Alongside this, Woking College also delivers a range of ESOL Entry, Level 1 and Level 2 courses and GCSE English and Maths for adult learners. The majority of the ESOL courses are taught on site with some online for those who are immobile. These courses provide important access to on-going education for adults who are often from minority ethnic groups. We work with Woking Borough Council to ensure that we are able to offer literacy classes with ESOL at a range of levels for Syrian, Afghan and Ukrainian refugees. *'Leaders (at the College) have developed effective partnerships with the local authority that helps them to understand the educational needs of the local community.'* (Ofsted Inspection October 2022).

The College is committed to the success of all our students. It treats students as individuals and thus regards equality, diversity and inclusivity as an integral part of student learning. '*Students thrive in the inclusive, respectful and very positive environment in which they learn.'* (Ofsted Inspection October 2022).

To fulfil its Public Sector Equality Duty, the College is required to report on the elimination of discrimination, harassment and victimisation, the advancement of equality of opportunity and the fostering of good relations.

The College's commitment to EDI is expressed within the Strategic Plan, which states that 'Our culture creates a humane community of aspiration, inspiration, challenge, inclusion, and care, in which all can thrive' and includes the Strategic Objectives:

1.1 Champion our inclusive ethos, welcoming and supporting a diverse range of students united by ambition and the drive to succeed.

4.2 Support inclusive behaviour and high standards, maintaining a safe, respectful and energised environment.

Additionally, Woking College's own Equality, Diversity and Inclusivity and Community Cohesion Policy incorporates the following governing principles:

Principle 1:   All learners are of equal value

Principle 2:   We recognise and respect diversity

Principle 3:   We foster positive attitudes and relationships, and a shared sense of cohesion and belonging

Principle 4:   Staff recruitment, retention and development

Principle 5:   We aim to reduce and remove inequalities and barriers that already exist

Principle 6:   We consult widely

The following report describes the progress the College has made towards meeting its own Equality, Diversity and Inclusivity policy principles and the three aims of its Public Sector Equality Duty. Furthermore, it is hoped that the reader will recognise Woking College's continued commitment towards meeting the spirit of equality, diversity and inclusivity for its students and staff.

Data on the diversity of students, staff and recruitment are contained in the Appendix. The College's SAR 2025, available on request, contains information on student results and other E & D outcomes.
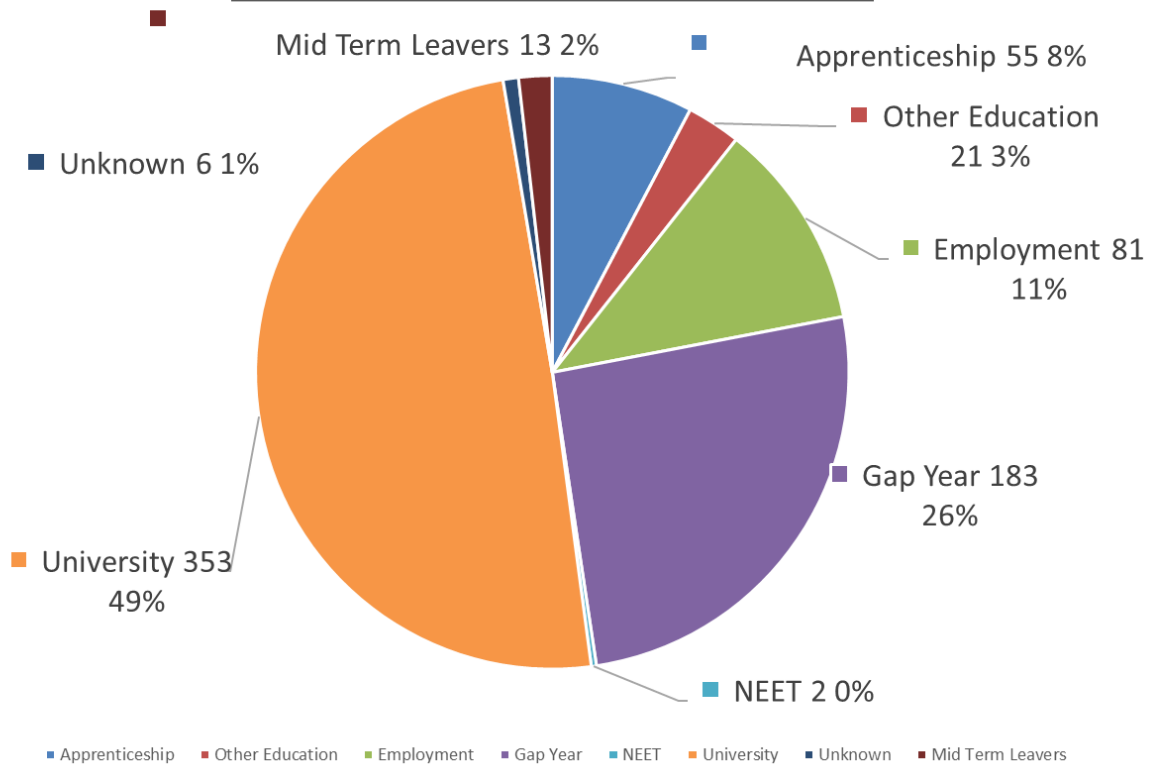
How principles and duties were met in 2024-25

Woking College Principle 1: All learners are of equal value

- The College lesson observation schedule monitors the practice of equality diversity and inclusivity as a standing item for all observations of lessons and tutorial sessions to ensure that all students are able to participate and progress equally.

- All Schemes of Learning are monitored to ensure equality, diversity and inclusivity is included in the teaching and resources of subject departments. SoLs have been reviewed in the last academic year and are centrally available.

- Examination results from summer 2025 demonstrate that achievement at the College remains high across the board, regardless of ethnic group or gender and that, in comparison with national trends, all groups perform better than, or in line with, comparable students nationally. Where some departments have shown slight deviations from this trend, SAR targets have been set with clear quality improvement plans.

- Students with a diagnosed learning need including those with an EHCP are well supported at Woking College. With many of our students receiving designated support, we believe the College to be highly inclusive and meeting the diverse needs of our broad cohort. In 2025-26, the number of students with an EHCP has increased since last year with 54 students having an EHCP in 2025 compared with 42 in 2024 and 41 in 2023.

- The Ofsted Inspection in October 2022 reported that *'Students feel safe when in the College and at the Maybury Community Centre. They know how to report concerns should they have them. They appreciate the welcoming, safe and supportive environment that leaders, managers and staff create.*

- The College's Careers Department continues to aid the progression prospects of all students, not only for those applying for university courses but also for those applying for apprenticeships or going into employment. In 2025-26 the new Careers Strategy and Action Plan includes a renewed focus on providing bespoke support to students with an EHCP or with additional learning needs and no EHCP, to support them to explore their next steps; apply for post-18 opportunities and develop softer skills to help prepare them for their next steps. This will include a planned Skills Curriculum run by the Learning Support department, as well as scheduled supported Careers Meetings for all students with an EHCP.
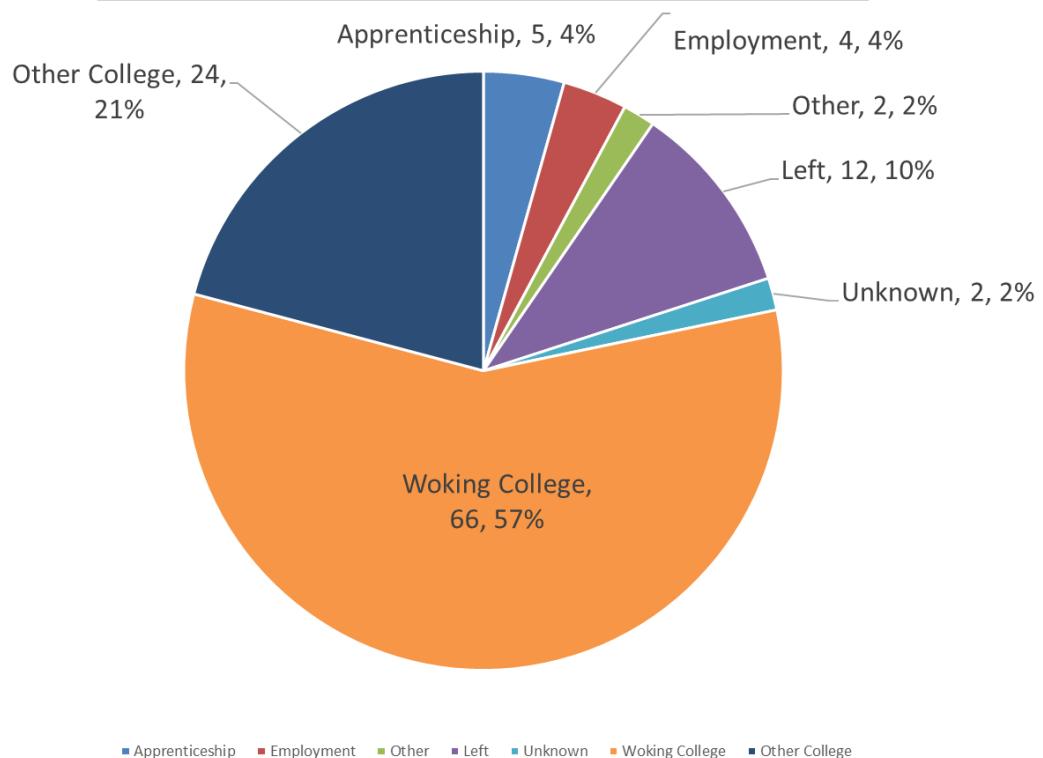
   In the following information, the figures for 2024 are in (brackets).

- There were 701 (547) Advanced Level students who completed their courses in 2025 and of these, 12% (11%) went into employment; 8% (11%) have been accepted into Apprenticeships; 50% (54%) have commenced Higher Education; 26% (19%) have taken a Gap Year and 3% (2%) have gone to other Further Education settings.
- If the assumption is made that those students taking a Gap Year will enter Higher Education, the total percentage of those entering Higher Education will be 76% (73%). If those on a Gap Year are excluded, it is 50% (54%).
- *353 (296) students accepted places on Higher Education courses, and of these 75% (83%) gained their first choice, 6% (0%) gained their insurance choice and 19% (17%) gained their place through clearing.*
- There were 103 (109) Level 1 and 2 students who completed their course and of these 87% (87%) continued with their education; 5% (4%) went into employment; and 5% (9%) started apprenticeships. Of those who remained in education 74% (74%) chose to do so at Woking College.

2025 Year 13 Destination Information

Mid Term Leavers 13 2%

Apprenticeship 55 8%

Other Education 21 3%

Unknown 6 1%

Employment 81 11%

Gap Year 183 26%

University 353 49%

NEET 2 0%

Apprenticeship ■ Other Education ■ Employment ■ Gap Year ■ NEET ■ University ■ Unknown ■ Mid Term Leavers

2025 Foundation Year Destination Information (L2)

Apprenticeship, 5, 4%

Employment, 4, 4%

Other College, 24, 21%

Other, 2, 2%

Left, 12, 10%

Unknown, 2, 2%

Woking College, 66, 57%

Apprenticeship ■ Employment ■ Other ■ Left ■ Unknown ■ Woking College ■ Other College

NB: This pie chart includes all Foundation students (so whole L2 cohort of 115 students) whereas the headline destinations refer only to those who completed the course (103 students)

Principle 2:   We recognise and respect diversity

For 2024/25, events included:

- An expanded Community Inclusion and Welcome Event during the new student Induction Day celebrating and supporting students and staff of varying faiths, ethnicities, disability, gender identity and sexuality. Visiting groups included Woking People of Faith, Action for Carers, Woking College Gender and Sexuality Alliance; Surrey Mental Health Support Team, Woking Police, The Student Assistance Programme, the Surrey Sexual Health Team, Your Sanctuary. The Lucy Rayner Foundation, Steps to Work, Engage, Health Watch Surrey and Luminus (Supporting carers).
- Black History Month in October included a bespoke Tutorial session for all year groups created by students for students. In departments, staff recommended and advertised TED talks, books and films; The Enrichment created Pop-up Activities including: Show Racism the Red Card
- Celebrating National ADHD awareness month
- Diwali celebration events and canteen pop up: making Diwali tea lights
- The Woking College Student Union ran a successful 'Culture Day' with students in cultural dress and bringing in food from their cultural heritage to celebrate the diversity within the College community
- LBGTQ+ month Feb- Tutor session created by GSA, Shared resource- podcasts/films
- EDI group well established with staff EDI reps in all departments meeting regularly as a group and a new student EDI group with reps feeding back into what can be done within each department and across college to further develop the College's diversity and inclusivity.
- Opportunities for widening understanding of stereotyping and prejudice e.g. through the lunchtime lecture on: Can only Muslims be terrorists?
- Ongoing work in departments to create resources and displays highlighting diversity within the subject including leading figures within the subjects; examples of individuals in relevant careers as well as information on our own College Alumni and where they have gone on to.
- Pride Month- SU event.
- Equality, diversity and inclusivity issues are regularly discussed during tutor periods as part of a taught curriculum of personal development, including trans-inclusion and awareness.
- College run Gender Sexuality Alliance group for students and a new Neurodiversity group was launched in 2024.
- A local group 'Engage' run the college Christian Union.
- The Woking College RESPECT CHARTER (created with input from students in all year groups in 2021-22) reiterates the whole college commitment to respect, inclusivity and tolerance for all and is introduced to all students as part of the College induction programme. This will be reviewed by students in 2025-26.
- All staff face-to-face training on Race and Ethnic Diversity in Education from Priya Barai in October 2022.

Principle 3: We foster positive attitudes and relationships, and a shared sense of cohesion and belonging

- The ESOL and adult provision provides access to education for learners with protected characteristics, with a high proportion of women learners from a wide range of ethnic backgrounds.
- In 2024-25 the number of adult learners with refugee status remained high with learners from Syria, Afghanistan and Ukraine continuing to access courses.

- Various fund-raising activities engage students with the needs of people in the community who are struggling. Students at Woking College regularly support local (e.g. Link-Able and Woking Hospice) and national charities through College charity events and the Christmas food donations.

- The College's Gender Sexuality Alliance reached out to all students at the College with educational material and events during Pride month.

- All staff work to embed Woking Values within the pastoral and academic curriculum and departments work to ensure that the representation of these values is clear in resources, displays and classroom activities.

- The College operates a zero tolerance policy on harassment or discrimination based on the Equality Act's protected characteristics and staff and students sign their agreement to abide by these expectations. The 2022 Ofsted Report recognised that '*Staff and students do not tolerate bullying, harassment and abuse and, as a result, instances of these are very rare.'*

Principle 4:   Staff recruitment, retention and development

- Staff development is partly addressed via targets set during lesson observations. The 20 minute, no-notice lesson observation system works well and staff feedback about the system is overwhelmingly positive. These observations frequently include mention of positive EDI aspects to the lesson and lessons reflect the inclusive nature of the College community.

- Staff develop further awareness of EDI issues as facilitators of tutor group discussions during the EDI themed weeks. Resources are shared in advance with notes to support discussion and additional training on challenging topics delivered as part of the personal tutor meetings.

- Staff meetings are held at different times and on different days to enable part-time staff or staff with caring responsibilities to take part more easily. The College also adheres to a strict finishing time of 5pm at these meetings in recognition of staff commitments outside of College.

- The College attracts job applicants from a wide range of backgrounds. In 2024-25, the College recruited new staff across age ranges and across several ethnic groups, thereby maintaining the diverse spectrum of current staff.

  These measures assist in eliminating discrimination and advancing opportunity as outlined in the Public Sector Equality Duty 1.

Principle 5:   We aim to reduce and remove inequalities and barriers that already exist

- Meetings have the permanent agenda item "Consideration of Equality, Diversity and inclusivity issues" to reflect on actions and decisions taken.

- In its annual Self-Assessment Report (SAR), the College analyses student results by gender and ethnicity by department. Where there are achievement gaps, departments are directed in their action plans to avoid a continuation of these performance gaps.

- The College continues to expand support for students who experience barriers to learning including Children Looked After and Previously Looked After; Young Carers, students with additional learning needs (including those with an EHCP), and students with Mental Health concerns.

- This support has included the continued development of additional provision such as the Progress Mentor Roles (supporting those with anxiety who struggle to access their learning) and ELSA support; as well as the expansion of existing support with a growth in the Head of Year team in 2024-25 from 5 to 7 Heads of Year.

- Woking College also works with a range of external providers to support the wellbeing of learners facing barriers to education, including in-college support from organisations including, Surrey MHST; Steps to Work and Action for Carers, as well as external referrals to groups such as Your Sanctuary and Surrey Children's Service Targeted Youth Support.

Principle 6: We consult widely

- Trustees and senior leaders frequently consult with learners, both formally (two qualitative and one quantitative survey per year) and through frequent, informal discussions and focus groups. The quantitative surveys results are also analysed according to equality, diversity and inclusivity criteria to establish any trends.

- The Student Union has an elected student representative for equality, diversity and inclusivity who attends the College's Equality, Diversity and inclusivity Group.

- The Staff Equality, Diversity and Inclusivity group has representatives from every department across college and meets regularly to review EDI issues and actions within departments and across the College. This includes planning for events and activities to highlight and celebrate diversity both within the College community and within subject areas in the wider world.

- The new college Neuroverse group created resources for Neurodiversity Celebration Week in 2024-25 which included tutorial resources and the launch of a new poster campaign across all teaching departments to highlight successful role models in professions linked to departmental subjects who have spoken about their own neurodivergence and the role it has played in their professional development. This campaign was student led and has been very well received.

- The Student Union also meet regularly with the Principal to raise any issues or concerns brought to them by the student body.

These actions above demonstrate progress towards meeting Public Sector Equality Duty 2 and 3.

Breakdown of student enrolments for 2025/26 (16-19 year olds) – 1841 students on roll

Gender

	Male	Female
2023/24	47%	53%
2024/25	46%	53%
2025/26	46%	54%

Ethnicity

	White	Pakistani	Other BME	Mixed	Unknown
2023/24	60%	11%	24%	5%	0%
2024/25	58.8%	8.2%	26%	6.7%	0.4%
2025/26	58%	8%	27%	7%	1%

Adult enrolments

Gender	2025/26	2024/25	2023/24
Female	56%	73%	73%
Male	44%	27%	27%

Ethnicity	2025/26	2024/25	2023/24
Mixed	6%	2%	3%
Other BME	29%	67%	82%
Pakistani	8%	4%	6%
Unknown	1%	2%	0%
White	57%	25%	10%

Of the general population in Woking, 78.4% identified their ethnic group as white, 14.2% as Asian, 1.8% as Black, 3.5% as mixed or multiple ethnic groups and 2.1% other ethnic groups (2021 Census data).

Staff list as at 13th November 2025 - 193 staff

		2025 Number	2025 %	2024 Number	2024 %	2023 Number	2023 %
Gender	Male	66	34%	59	32%	49	29%
	Female	126	65%	121	66%	118	70%
	Prefer to self describe	1	1%	2	1%	2	1%
	Total	**193**	**100%**	**182**	**100%**	**169**	**100%**
Disability	Yes	6	3%	6	3%	5	3%
	No	176	97%	176	97%	164	97%
	Total	182	100%	182	100%	169	100%
Age	Below 26	12	6%	15	8%	17	10%
	26-35	29	15%	24	13%	24	14%
	36-46	53	27%	50	27%	48	29%
	47-55	56	29%	47	26%	43	26%
	56-64	39	20%	40	22%	32	19%
	65+	4	2%	6	3%	4	2%
	Total	**193**	**100%**	**182**	**100%**	**168**	**100%**
Ethnicity	Asian/Asian British Bangladeshi	1	1%	1	1%	1	1%
	Asian/Asian British Indian	5	3%	5	3%	3	2%
	Asian/Asian British Chinese	3	2%	2	1%	2	1%
	Asian/Asian British Other	2	1%	3	2%	2	1%
	Asian/Asian British Pakistani	6	3%	8	4%	5	3%
	Black/Black British African	3	2%	4	2%	3	2%
	Black/Black British Caribbean	2	1%	1	1%	1	1%
	Black/Black British Other	2	1%	1	1%		0%
	Mixed Other	2	1%	3	2%	3	2%
	Mixed White/Asian	1	1%		0%		0%
	Mixed White/Black Caribbean		0%		0%		0%
	Mixed White/Black African		0%		0%		0%
	White British	151	78%	140	77%	137	81%
	White Irish	1	1%	1	1%	1	1%
	White Other	12	6%	12	7%	10	6%
	Other - Gypsy, Roma, Traveller		0%		0%		0%
	Other - Arab	1	1%	1	1%	1	1%
	Other	1	1%		0%		0%
	Total	**193**	**100%**	**182**	**100%**	**169**	**100%**

Ethnicity of Woking College Staff in Comparison to UK and to Woking area

	College Staff 2025 Staff	UK population 2025 data	Woking 2021 census data
Asian/ Asian British	9%	9.3%	14.2%
Black / Black British/ Black Caribbean	4%	4%	1.8%
Mixed ethnicity	1%	3%	3.5%
White (any)	85%	81.7%	78.4%
Other / not declared	1%	2%	2.1%

Information sources for the data above: How life has changed in Woking: Census 2021   Population of England and Wales - GOV.UK Ethnicity facts and figures

Recruitment: for Support staff roles starting in academic year 2024-25

	Number of applicants:	249					No. of candidates employed:	25			
		2024-25 numbers	2024-25 %	2023-24 numbers	2023-24 %			2024-25 numbers	2024-25 %	2023-24 numbers	2023-24 %
Gender	Male	112	45%	58	43%	**Gender**	Male	9	36%	3	20%
	Female	136	55%	77	57%		Female	16	64%	12	80%
	Prefer to self describe	1	0%	0	0%		Prefer to self describe		0%	0	0%
	Total	**249**	**100%**	**135**	**100%**		**Total**	**25**	**100%**	**15**	**100%**
Disability	Yes	23	9%	10	7%	**Disability**	Yes		0%		0%
	No	222	89%	121	90%		No	25	100%	14	93%
	Not specified	4	2%	4	3%		Not specified		0%	1	7%
	Total	**249**	**100%**	**135**	**100%**		**Total**	**25**	**100%**	**15**	**100%**
Age	Below 26	60	24%	32	24%	**Age**	Below 26	3	12%	4	27%
	26-35	57	23%	33	24%		26-35	4	16%	0	0%
	36-46	45	18%	37	27%		36-46	3	12%	6	40%
	47-55	57	23%	25	19%		47-55	7	28%	4	27%
	56-64	21	8%	8	6%		56-64	7	28%	1	7%
	65+	2	1%		0%		65+	1	4%	0	0%
	Not specified	7	3%		0%		Not specified		0%		
	Total	**249**	**100%**	**135**	**100%**		**Total**	**25**	**100%**	**15**	**100%**
Ethnicity	Asian/Asian British Bangladeshi	4	2%	2	1%	**Ethnicity**	Asian/Asian British Bangladeshi		0%	0	0%
	Asian/Asian British Indian	24	10%	6	4%		Asian/Asian British Indian		0%	0	0%
	Asian/Asian British Chinese	20	8%	11	8%		Asian/Asian British Chinese	1	4%	0	0%
	Asian/Asian British Other	15	6%	5	4%		Asian/Asian British Other	2	8%	0	0%
	Asian/Asian British Pakistani	10	4%	8	6%		Asian/Asian British Pakistani		0%	1	7%
	Black/Black British African	17	7%	3	2%		Black/Black British African		0%	1	7%
	Black/Black British Caribbean	4	2%	1	1%		Black/Black British Caribbean		0%	0	0%
	Black/Black British Other		0%		0%		Black/Black British Other		0%	0	0%
	Mixed Other		0%		0%		Mixed Other		0%	0	0%
	Mixed White/Asian	3	1%	1	1%		Mixed White/Asian		0%	0	0%
	Mixed White/Black Caribbean	1	0%	3	2%		Mixed White/Black Caribbean	1	4%	0	0%
	Mixed White/Black African		0%		0%		Mixed White/Black African		0%	0	0%
	White British	106	43%	70	52%		White British	19	76%	12	80%
	White Irish	3	1%		0%		White Irish		0%	0	0%
	White Other	29	12%	18	13%		White Other	2	8%	1	7%
	Other - Gypsy, Roma, Traveller		0%		0%		Other - Gypsy, Roma, Traveller		0%	0	0%
	Other - Arab		0%	1	1%		Other - Arab		0%	0	0%
	Other	6	2%	4	3%		Other		0%	0	0%
	Not specified	7	3%	2	1%		Not specified		0%	0	0%
	Total	**249**	**100%**	**135**	**100%**		**Total**	**25**	**100%**	**15**	**100%**

Recruitment: for Teaching roles starting in academic year 2024-25

Number of applicants:		249				No. of candidates employed:		25			
		2024-25 numbers	2024-25 %	2023-24 numbers	2023-24 %			2024-25 numbers	2024-25 %	2023-24 numbers	2023-24 %
Gender	Male	43	35%	44	46%	**Gender**	Male	8	32%	8	38%
	Female	80	65%	51	54%		Female	17	68%	13	62%
	Prefer to self describe	1	1%	0	0%		Prefer to self describe		0%	0	0%
	Total	**124**	**100%**	**95**	**100%**		**Total**	**25**	**100%**	**21**	**100%**
Disability	Yes	12	10%	7	7%	**Disability**	Yes	1	4%	0	0%
	No	110	89%	85	90%		No	24	96%	14	93%
	Not specified	2	2%	2	2%		Not specified	0	0%	1	7%
	Total	124	100%	94	100%		**Total**	**25**	**100%**	**15**	**100%**
Age	Below 26	12	10%	14	15%	**Age**	Below 26	1	4%	6	29%
	26-35	31	25%	28	29%		26-35	5	20%	6	29%
	36-46	39	31%	24	25%		36-46	11	44%	2	10%
	47-55	36	29%	20	21%		47-55	7	28%	7	33%
	56-64	5	4%	7	7%		56-64	1	4%	0	0%
	65+	1	1%	0	0%		65+		0%	0	0%
	Not specified		0%	2	2%		Not specified		0%	0	0%
	Total	**124**	**100%**	**95**	**100%**		**Total**	**25**	**100%**	**21**	**100%**
Ethnicity	Asian/Asian British Bangladeshi	1	1%	2	2%	**Ethnicity**	Asian/Asian British Bangladeshi		0%		0%
	Asian/Asian British Indian	6	5%	6	6%		Asian/Asian British Indian	1	4%	1	5%
	Asian/Asian British Chinese	3	2%	3	3%		Asian/Asian British Chinese		0%	1	5%
	Asian/Asian British Other	3	2%	1	1%		Asian/Asian British Other		0%		0%
	Asian/Asian British Pakistani	7	6%	4	4%		Asian/Asian British Pakistani	2	8%	1	5%
	Black/Black British African	5	4%	15	16%		Black/Black British African		0%	2	10%
	Black/Black British Caribbean	2	2%		0%		Black/Black British Caribbean		0%		0%
	Black/Black British Other		0%		0%		Black/Black British Other		0%		0%
	Mixed Other		0%	1	1%		Mixed Other		0%	1	5%
	Mixed White/Asian	2	2%		0%		Mixed White/Asian	1	4%		0%
	Mixed White/Black Caribbean	2	2%		0%		Mixed White/Black Caribbean		0%		0%
	Mixed White/Black African		0%		0%		Mixed White/Black African		0%		0%
	White British	63	51%	40	42%		White British	16	64%	12	57%
	White Irish		0%	1	1%		White Irish		0%		0%
	White Other	22	18%	13	14%		White Other	2	8%	1	5%
	Other - Gypsy, Roma, Traveller		0%		0%		Other - Gypsy, Roma, Traveller		0%		0%
	Other - Arab		0%	4	4%		Other - Arab		0%	1	5%
	Other	8	6%	4	4%		Other	2	8%	1	5%
	Not specified	2	2%	1	1%		Not specified	1	4%		0%
	Total	**124**	**100%**	**95**	**100%**		**Total**	**25**	**100%**	**21**	**100%**

Equality objectives 2024-27

Woking College has agreed on the following equality objectives as a focus for the period from Jan 2024-Jan 2027:

1. To promote cultural understanding and tolerance of different religious beliefs and ethnic groups.
2. To promote mental health awareness and develop appropriate support strategies.
3. To monitor, record and address incidents involving the use of discriminatory language by students and to further develop the pastoral curriculum to educate students on the importance of ensuring they do not use discriminatory language.

Progress towards these objectives across the year 2025-26

1. **To promote cultural understanding and tolerance of different religious beliefs and ethnic groups.**
   - Ongoing use of the Woking College Respect Charter and the Student Code of Conduct, to promote tolerance and understanding through the pastoral programme.
   - Student Union run Culture Day promoting cultural diversity and celebrating the diversity within the college community.

2. **To promote mental health awareness and develop appropriate support strategies.**
   - An increase in pastoral sessions on wellbeing and mental health.
   - Expanded work with the Surrey Mental Health Support Team to facilitate additional mental health provision within the college in the form of evidence-based CBT interventions offered to students on a staff or self-referral basis.
   - Ongoing provision of the on-site counselling service.
   - Suicide-prevention training for all teaching and learning support staff with more specialist training for the pastoral team.
   - An ongoing programme of additional training for pastoral leaders including Bereavement and eating disorders training.
   - Training of the Student Wellbeing Co-ordinator to be a Mental Health First Aid trainer and a new programme to roll out training in MHFA to all staff across the next 3 years (2025-28)

3. **To monitor, record and address incidents involving the use of discriminatory language by students and to further develop the pastoral curriculum to educate students on the importance of ensuring they do not use discriminatory language.**
   - Robust processes to address incidents of discrimination both online and in person which are logged via CPOMS and managed with reference to the Student Disciplinary Policy and procedures.
   - Induction tutorial sessions focusing on acceptable and discriminatory language use and the college's zero-tolerance approach.
   - Robust monitoring of the college network to flag instances of discriminatory language online. These instances are dealt with in the same way as in person instances of discrimination.