

Equalities Impact Assessment (EQIA) Project Summary

September 2016

Project Aim:

- To identify decisions that have had an impact on protected characteristic groups
- Analyse the development of key decisions to ensure decisions are evidence based
- Assess whether any mitigating actions have been embedded into the decision making process
- Analyse data on the impact of key decisions on protected characteristic groups
- Highlight areas of good practice
- Summarise the data and evidence as part of our overall evidence of meeting the equality duty

Activity:

- Analysis of Board of Management and Strategic Development Committee minutes March 2015, March 2016, June 2016
- Analysis of self-evaluation reports 2016
- Analysis of other practice in external organisations including other colleges and Scottish Government
- BOM, Heads of Service and Heads of Teaching Departments training

Findings:

- Having analysed the papers that were presented to BOM it is true to say that many of the papers that are presented to Board of Management may have resulted in a change to practice and therefore have a possible impact on either staff or student profile, retention or progression or overall experience. However, the impact assessment mechanism would not identify this from the paper itself. It is more a case of looking at practice and results.
- Many BOM papers are updates and for information only, whilst these would not be subject to impact assessment, there are times when equality could be more fully reflected on within these.
- It is more likely that decisions that are made at SMT level should be fully impact assessed prior to any final papers being presented to the Board.
- Some aspects of the college strategic approach that should be impact assessed as a matter of course are the Strategic Plan, Operational Plans, Outcome Agreement etc. In order to demonstrate this commitment, these plans should have equality embedded within them and a statement that

ensures any resultant changes to practice from these approaches will be impact assessed.

- Appendix 1 is an example of an impact assessment on the College Outcome Agreement 2015/17 which demonstrates how that would be impact assessed
- Self-evaluation essentially is an inbuilt mechanism that ensures we assess the impact of our practices. However from an equality point of view it would be beneficial to include additional evaluative questions that allow staff to reflect on equality and inclusion (e.g. inclusive L&T practices, analysis of performance indicators, reasonable adjustments for all PCs, equality and diversity in the curriculum, awareness raising projects and activities, staff and student support mechanisms etc)
- External organisations such as Scottish Government and Local Authorities have a robust equality impact assessment process and the following links take you to examples of these:
 - Developing the Young Workforce Strategy:
<http://www.gov.scot/Resource/0045/00451787.pdf>
 - The Education Scotland Bill 2015:
<http://www.gov.scot/Resource/0047/00473670.pdf>
 - Falkirk Council – Local Housing Strategy:
<https://www.falkirk.gov.uk/services/homes-property/policies-strategies/docs/local-housing-strategy/6%20Appendix%206%20-Equality%20Impacts%20Assessment.pdf?v=201412161537>
 - Stirling Council – Theme 2 – Transforming Care
http://www.stirling.gov.uk/_documents/theme-2-eqia-final.pdf
- Other colleges have a low key approach to impact assessment and very few have evidence of their impact assessment approach or results on their websites. Examples of those that do concentrate on impact assessing policies such as City of Glasgow (Risk Management Policy; Stress Management Policy; New Campus Policy) and Edinburgh College – Careers advice service relocation; Health and Safety Policy; Priority access to support funds etc
- At FVC we do not have a lot of evidence of impact assessment being carried out but as the attached example of an impact assessment on the outcome agreement demonstrates it is purely a matter of drawing out the equality implications that staff have considered but still need to evidence.

Conclusion

- Whilst FVC staff have been trained, they require to fully address impact assessment in all aspects of practice; the most effective mechanism for doing so remains the completion of an impact assessment template to evidence equality considerations.
- The sector does not have any strong examples or evidence of good practice

- Other sectors such as Scottish Government and Local Authorities are more robust in their approach

Recommendation

- All matters at SMT level should have some aspect of equalities embedded into their consideration. This can then be evidenced in minutes or data.
- Key decisions that have an impact on a large group of people or that have a major impact on a smaller group of people are likely to require a full impact assessment using our college template.
- A short review of current college policies (practices and procedures) should be undertaken to update the current position on college approach including informal custom and practices across all departments.
- A mechanism to include additional equality considerations in self-evaluation should be developed



Appendix 1

EQUALITY IMPACT ASSESSMENT revised 2015

The purpose of this template is to guide policy makers in equality considerations whilst developing new or revising existing policies, practices or procedures. It should be used in conjunction with the Guidance Notes

Name of Policy:	Forth Valley College Outcome Agreement 2015/17
Assessed by:	Caroline Storey
Date of Assessment:	June 2016

Step 1: Identify aims of the policy

What is the **purpose** of the policy? How do these relate to equality?

The aim of the Outcome Agreement (OA) is to outline to Scottish Funding Council (SFC) how we are meeting Scottish Government priorities and to set out our key priorities over the period from 2015-17. The OA aims to benefit all students and staff of the college and operates within the context of the College's corporate plan. The OA aims to ensure college provision meets national and local priorities, protected characteristic students are able to access this fully and that they will be retained and succeed on their chosen programmes whilst also ensuring that there is no difference in overall college experience for these groups.

The priorities relate to equality in terms of our duty to advance equality for all protected characteristic groups.

The OA does not necessarily outline how we will eliminate discrimination, victimisation and harassment or how we will foster good relations as these are outlined in our Equality Outcome plan and activities in our overall strategic and operational plans demonstrate how we meet these elements of the duty.

Step 2: Consider the evidence

What data or evidence do you intend to use for the purposes of the assessment? Are there any gaps in evidence? How will these be filled?

The data used in the outcome agreement consists of:

College wide PI data for full-time FE, full-time HE, part time FE and part-time HE rates; Specific data for the protected characteristics of age, race, disability and gender have also been examined where relevant;

Staff cultural surveys and student feedback mechanisms are all referred to in the outcome agreement including specific feedback from ELS students on the Learning Support service.

Issues were identified as follows:

Gender: under-representation in some subject areas; DYW priority

Age: youth unemployment rate is higher in FV area and the level of SCQF amongst this group is lower than the Scottish average – this has an implication for provision at this level

Step 3: Assess likely impact

3.1 What does the information you have tell you about how this policy might eliminate discrimination

The strategy does not have any specific actions that would eliminate discrimination, however by taking cognisance of the needs of students and staff with protected characteristics it does ensure that discrimination does not occur for any one group.

Reasonable adjustments are built into programme provision and service delivery through our Learning Development service, our approach to learning and teaching as outlined in the learning and teaching strategy and our Equality Outcomes – the OA should make specific reference to this.

3.2 How does the policy contribute to advancing equality of opportunity?

Key aspects of the OA that contribute to the advancing of equality of opportunity and positively impact on protected characteristic groups are:

- Inclusion of the implementation plan for Developing the Young Workforce (age)
- Ref Strategic Plan priority 2: Developing a school/college plan (age)
- Ref Strategic Plan priority 5: Developing engagement mechanisms with each client group (all PCs)

- Ref Strategic Plan priority 3: Developing policies plans and procedures to achieve the general and specific duties and to promote the ethos of inclusion (all PCs)
- Local Employability Partnership conference to examine DYW and Opportunities for All and subsequent college partnerships and provision (age)
- Target to increase SUMS to young learners aged 16-19 by 3% could advance equality of opportunity for the PC of age given the data in section 2 regarding unemployment and qualification level of this group. (age)
- Target to increase HNC provision for S5 and S6 instead of Highers (age)
- SCOTS programme guarantees progression pathways – there are positive impacts for age (age - provides access to college for young people); gender (gender - challenges of under-representation mentioned and tasters across all subject areas will challenge gender stereotypical responses)
- Mention of providing clear vocational pathways for young people, looked after young people and care leavers or those with additional support needs (provision of alternative curriculum)
- Where appropriate activities will be targeted at specific gender groups to promote STEM subjects to girls and subjects such as care to boys (gender)
- CPD plan provides bespoke CPD for staff – a focus on staff who would be working with younger learners is mentioned as a priority (age)
- Integrated degree programmes increase the participation of students from MD40 areas at a higher rate than those on traditional under-graduate programmes (social inequality)
- Increase in Modern Apprenticeship provision (age)
- Specific mention is made of services to remove and minimise disadvantage for the protected characteristic group of disability and also care experienced young people – Learning Support Service and Access and Progression provision specifically targeted at this PC group
- Target to increase the number of learners from the 10% most deprived postcode areas (social inequality)
- Target to increase the number of BME enrolments (race)
- Target to increase the number of females studying particular subject areas (gender)

Aspects of the OA that could be strengthened or that impact negatively on protected characteristic groups are:

- Data analysis – mentioned could be made of the internal exercise to review PIs by equalities profiles
- Much of the focus is on young learners (in response to national priorities) – we should think about how that impacts on other learners – is there a negative impact? If not, how can we demonstrate that?
- CPD plan – this could specifically include mention of the fact that we offer equality and diversity training; we could consider unconscious bias training to target gender issues in particular
- We should monitor access to CPD by equalities profiles of staff
- The Modern Apprenticeship section makes no reference to data regarding equalities profiles and the fact that women, BME and people with disabilities are under-represented on MAs

Report B – Appendix 5

3.3 How does the policy affect good relations?

Good relations are tackled through other aspects of college provision – Learning and Teaching strategy/Student Association posts and events/Equalities awareness raising events

Step 4: Decision Making

Use the options below to summarise how your assessment has informed your decisions

- 4.1 No major change (policy is robust)
- 4.2 Adjust the policy (take steps to meet the general duty)
- 4.3 Continue the policy (continue despite the potential for adverse impact)
- 4.4 Stop and remove the policy (where adverse effects are not justified and cannot be mitigated or where the policy leads to unlawful discrimination)

The plan is robust and makes many references to how the college is meeting its equality duty to advance equality of opportunity.

Some aspects of the plan could be strengthened to reflect the work that is already happening across college.

Specific actions/data information on impacts for students who are not young learners should be made

Actions to tackle gender and under-representation should be more explicit

Step 5: Publication

Describe the arrangements for the publication of the results of assessment

This assessment is part of a retrospective analysis of college decisions.

Step 6: Monitoring and Review

Describe how the policy will be monitored and reviewed

A summary will be published in our annual summary of impact assessment and placed on our website.

Please return completed impact assessment to equality@forthvalley.ac.uk

If you require any assistance in completing the form contact
equality@forthvalley.ac.uk