

Race Equality Policies – Annual Reports Generic HEFCW Feedback

Introduction

This paper provides general feedback to higher education institutions on the reports they are expected to publish annually, under the Race Relations (Amendment) Act 2000, on their race equality policies. As part of its sector monitoring role, the Council collects and analyses these reports on an annual basis, giving feedback to institutions to assist their further development.

Many of the areas raised in the Council's feedback on 2004 submissions, which was sent to heads of institutions, did not appear to have been taken into account in 2005 reports. This paper therefore brings together feedback on the reports submitted to the Council in both 2004 and 2005. To improve dissemination, this report will be published as a circular and on the HEFCW web site. In addition, HEFCW is commissioning consultancy support to assist the further embedding of institutional race equality policies, including reviewing the policies themselves and the reporting arrangements.

General Issues of Process

Areas of concern:

- One or two institutions are still focussed on developing their race equality policies and action plans and had not recognised the expectation to report annually (and publicly) on the outcomes of monitoring their policies.
- Several institutions prepared a report for HEFCW, rather than submitting a copy of the annual report that they should be publishing on their policy. This negates HEFCW's approach, which is designed to minimise the burden on institutions by requesting copies of their own published reports.

Other issues:

- In several cases, the timetable for reporting annually within the institution and publishing does not fit with the HEFCW strategic planning timetable, which has a July deadline. This means that the report submitted to HEFCW refers to the previous year. The timetable will remain the same in 2005/06 but a consideration of this matter will be built in to the work on the review of policies which is being commissioned by the Council.
- A number of institutions submitted copies of their current race equality policies and/or action plans with the report and these have been taken into account in this feedback.

Internal Structures

Areas of good practice:

- Most institutions have an Equal Opportunities/Diversity Committee or Group, often with a sub-group on Race, which has considered the annual report in detail before passing on to other committees within the institution.

- In several cases, the Equal Opportunities/Diversity Committee/Group or race sub-group includes external representation, often from the local Race Equality Council.
- Some institutions have reviewed their committee structures for equal opportunities and diversity and included additional members, eg representatives of the trades unions and/or students union.
- Most institutions note the involvement of the Board of Governors/Council in finalising the report for publication/submission to HEFCW.
- In some cases, a full and detailed report is presented to the Board of Governors/Council, with a more accessible summary being prepared for publication.
- A number of institutions included a foreword or signature by a member of the senior management team. In terms of reporting to the public, this signifies the importance given to race equality matters within the institution and provides reassurance that senior management recognise this.
- Some institutions have devoted time to consolidating methods of working across the institution on equal opportunities to ensure a 'joined-up' approach to these issues, for example links between the equality and diversity function, learning and teaching and student services.
- In 2005 submissions, more institutions showed how links are made between racial equality and other areas of equal opportunities within the institutions, including in considering monitoring data.
- Specific mention is made of contractors and visitors on campus in relation to race equality responsibilities.

Areas of concern:

- In a number of cases, the responsibility for equal opportunities, including the Equal Opportunities committee/group, is focused on the Human Resources function. In some reports, this is reflected through an overall emphasis on staffing issues, rather than the more comprehensive approach required for both staff and students. It should be noted that this focus does not meet the requirements of the legislation.
- It should not be possible, from monitoring data published, to identify individual members of staff. In terms of published data, aggregation of some data sets, publication of percentages only; or the use of asterisks where numbers are below 5 may assist this situation.
- There is a need for institutions to take account of forthcoming legal requirements, particularly in terms of age, disability and gender, without losing the required focus on race equality.

Internal Policies and Procedures

Areas of good practice:

- Many institutions make reference to the development of new policies and procedures in response to race equality issues, for example, Harassment Policies; a policy on Discrimination, Harassment and Bullying in the Workplace (staff) and Complaints of Racial Discrimination (Students); a Code of Practice on Dignity at Work and Study; Mediation.
- One institution notes that a copy of the race equality policy is included with all tender documents. Several institutions are preparing user-friendly summaries of race equality policies for staff and students and/or distribution more generally.

- Several institutions are considering the race equality implications for overseas franchise partners and are looking at the race equality dimensions for home and overseas students.
- Several institutions have recognised the need for ‘champions’ to take forward the race equality policy. One institution has established a network of equal opportunities advisers in departments to champion equal opportunities principles and ensure that equality is promulgated through the department and institution.
- Many institutions have established separate web pages on equal opportunities or diversity, to include race equality policies and related documentation and links to guidance documentation.
- One or two institutions are reviewing marketing documentation, including consulting staff and students.
- One institution refers to the establishment of a support group for BME students and a focus group for BME staff.
- A number of institutions are looking at the implications of diversity for learning and teaching and some are building this into the review of their learning and teaching strategies. One institution convened a learning and teaching conference on the theme ‘Equality and Excellence’. Another refers to guidance on inclusivity in the curriculum, issued to Deans of Schools.
- Several institutions refer to initiatives taken by the institutional crèche or nursery to promote race equality, including taking account of provisions for religion and belief.

Impact Assessment

- Several institutions report that they have undertaken, or are planning, race equality impact assessment of policies and procedures, sometime utilising current guidance, such as Commission for Racial Equality (CRE) impact assessment guidance and/or the HEFCE Race Equality Impact Assessment tool.
- One institution notes an intention that courses will be reviewed for race equality compliance as they go through the validation or revalidation process.

Area of concern

- Only one institution reported on the outcome of race equality impact assessments and how that will now affect the areas assessed. Institutions are expected to report back on the outcome of formal impact assessments. The annual report would comprise a good opportunity for publishing such feedback.

Statistical information

Areas of good practice:

- The majority of reports include monitoring information. A wide variety of data sources have been used, including from a local, national and UK perspective.
- Some reports are explicit in noting the use of CRE and/or other guidance (such as the HEFCE publication) in undertaking ethnic monitoring.
- In terms of the ethnic monitoring of staff, institutions have considered applications; shortlisting; offers; acceptances; appointments; earnings; applications for promotion; gender; age; staff in different occupations and on different grades; regradings; staff on fixed term contracts; the percentage of ‘unknowns’; reasons for leaving; allegations of racial discrimination/harassment. This analysis includes

academic and all staff, usually broken down by department/school or category of staff. In one case the monitoring covered seven occupational groups.

- One institution plans to make promotions data available to staff on an annual basis.
- One institution has analysed travel to work patterns to give information on recruitment catchment areas and inform benchmarking.
- It appears that overall there has been a narrower range of monitoring of the student population. Institutions are using census categories, or sometimes the more detailed CRE categories to monitor applications; enrolments/registrations (including by FT/PT and Sandwich); withdrawals; first destinations; progress to postgraduate study; degree classifications; student complaints. One institution is considering monitoring use of student services and another is looking at a breakdown between home and international students. A number make cross-department/school comparisons and one compares the institution's HE and FE students.
- In monitoring admissions, one institution includes choice of subject; home or international status; and selection method, amongst the factors monitored.
- Several institutions are considering processes for tracking students from enrolment to completion.
- One institution reports completion of an audit of all current staff to ensure that monitoring information is up to date, another included race equality within its generic staff survey.
- Monitoring is also being undertaken of cases of race complaints related to Welsh/English tensions.

Areas of concern:

- In some cases, the monitoring information included relates only to staff.
- The link between the outcomes of monitoring and the action taken is not always clear.
- Further work is needed on the percentages of 'unknowns' which has not been considered in the monitoring in a number of institutions (see below).

Some Conclusions from Institution's Monitoring

- Overall, the student minority ethnic population in the institutions exceeds that of the local area or, more usually, the minority ethnic population of Wales as a whole. It is not always clear whether this data has been considered broken down by different racial groups.
- The situation for staff recruitment is complicated by the need to look at the catchment area for recruitment. However, a number of institutions have considered this matter and analysed monitoring information against local, national and UK data.
- There is little mention of recruitment targets being set using monitoring information, although one institution notes that there are no black and other ethnic minority staff in some occupations and will be addressing this. It is important that institutions set targets for recruitment, taking into account the outcomes of monitoring.
- One institution has noted that the (albeit small) population of Further Education students has a higher proportion of ethnic minorities than the higher education provision in the institution.
- One institution has monitored staff on fixed term contracts and discovered that BME staff comprise more than double the percentage of white staff in this category.
- As noted above, few institutions appear to have considered the issue of 'unknown' responses to race equality monitoring and the impact that this might have on the

outcomes of monitoring. It is clear that these rates of 'unknown' vary considerably across the sector and that there may be good practice to be shared in this area. One institution has focused on this area, resulting in a decline in the percentage of 'unknowns' recorded.

- One institution has analysed unknowns by department and has noted a range, even across the institution.
- Where figures are given, most institutions report increases in the BME staff and student population between the 2004 and 2005 reports submitted. This is encouraging. However, given overall performance, it points to a need to investigate some of the monitoring data in more detail and consult via impact assessments to ensure that issues of concern are identified.

Partnership Working

- Most institutions have developed links with local race equality organisations/networks and have, in some cases, included representation from those bodies on internal committees;
- One institution organised and coordinated a meeting between the local race equality network and HE/FE institutions in the area to allow for a single point of liaison. This should assist in reducing the burden on the ethnic minority voluntary sector in terms of responding to institutions on race equality matters.
- One institution refers to the involvement of franchise partners in race equality matters.
- Several institutions have developed links with the local police, including the Diversity Officer, Minorities Support Unit, or similar function.
- Several institutions are working closely with their students' union. Examples of action include: jointly developed training materials; a stand promoting equal opportunities at the Freshers Fair; a jointly organised Diversity Day; a week of joint cultural activities, including international students.
- Several institutions have worked together in developing their approach to equal opportunities, including sharing copies of their annual reports prior to publication. Two institutions are considering the possibility of sharing training provision. One institution has established links with the local NHS trust to consider joint initiatives.
- A number of institutions refer to assistance from the Equality Challenge Unit, or to ECU publications in developing their approach to race equality.

Training

- Almost all responses refer to training programmes. At this stage, most have focused on more generic equal opportunities/diversity awareness training for all staff. In some cases these are mandatory for all staff, or compulsory for new staff.
- General training sessions included utilising the 'Meeting the Challenge' video and 'Good Talking' guidance published by the Equality Challenge Unit; one institution refers to a blended e-learning approach to training. One notes the roll out to all departments and schools of a CD Rom 'Diversity Awareness Introduction' and another has an e-learning 'Introduction to Diversity at Work' which will be bilingual.
- More specific training events include mandatory training on race equality for all those involved in selection; targeted training for heads of department, Chairs of Committees and Council members; specific training for admissions tutors; training for Academic Registry staff, particularly as part of international student work; diversity training attended by staff and police officers; equality and diversity training

for student wardens; Personal Tutors; security staff; SU sabbaticals; and training for PGCE (teacher training) students.

Research and Development

- Several institutions have instituted projects to develop awareness of race equality recruitment and retention to feed into the development of their race equality policies with regard to widening access.
- One institution is undertaking a collaborative project with the local race equality council to identify the best method of consulting with the BME population locally.

Other ideas

- One institution has instituted an annual equal opportunities lecture.
- Another has sponsored a Black Film Festival.
- One institution reports the award of a Leadership Foundation fellowship focussing on equality and diversity.

References:

Reminder of the Annual Publishing Duty (Equality Challenge Unit Update 11/03)

<http://www.ecu.ac.uk/updates/downloads/text/11-03.txt>

Good Talking The HE Communicators Equality and Diversity Toolkit (Equality Challenge Unit/HEFCE June 2004)

<http://www.ecu.ac.uk/publications/downloads/GoodTalking.pdf>

Race equality impact assessment: a step-by-step guide (Commission for Racial Equality, 2004)

<http://www.cre.gov.uk/duty/reia/index.html>

Conducting impact assessments for equal opportunities in higher education: a guide to good practice (HEFCE October 2004/37)

http://www.hefce.ac.uk/Pubs/hefce/2004/04_37/

Equality and diversity monitoring in higher education institutions

A guide to good practice (HEFCE April 2004/14)

http://www.hefce.ac.uk/Pubs/hefce/2004/04_14/

Race Equality Communication and Consultation Toolkit for Higher Education Institutions (ECU/JNCHES December 2004)

<http://www.ecu.ac.uk/publications/guidancepublications/>

RACE EQUALITY IMPACT ASSESSMENT FEEDBACK

INTRODUCTION

- 1 This paper presents a summary of responses to HEFCW's consultation on its race equality impact assessment (W06/05HE).

BACKGROUND

- 2 Within the arrangements for its Race Equality Scheme, HEFCW undertook a race equality impact assessment in the widening access policy area. The purpose of the impact assessment was to explore issues related to increasing the number of under-represented students from black and other ethnic minority (BME) communities entering higher education in Wales, including: entry barriers, retention, academic achievement and graduate employment.
- 3 HEFCW undertook a quantitative analysis of monitoring information and invited the sector, in circular W06/05HE, to consult with their equal opportunities or other committees where possible, to provide additional, qualitative responses to issues of access and retention facing black and other ethnic minority groups in higher education in Wales. The outcomes of the assessment would be used to inform the guidance on new Widening Access Strategies (2006/07 to 2008/09).

SUMMARY OF RESPONSES TO THE RACE EQUALITY IMPACT ASSESSMENT (W06/05HE)

- 4 Ten responses were received from higher education institutions in Wales. The questions in the circular, which offered a framework for responses, are attached as **Annex A**. Responses identified some potential barriers to HE for BME groups. However, they cautioned against making generalisations or assuming that the barriers were the same in all cases, or existed at all for some students. One response suggested a disaggregation of home and overseas students' statistical data to enable more effective tracking and monitoring of UK resident BME students.
- 5 Responses drew attention to the following issues:
BARRIERS PREVENTING ACCESS TO HIGHER EDUCATION BY CERTAIN ETHNIC MINORITY GROUPS
- 6 Most responses noted that many black and other ethnic minority families lived in deprived communities. A multitude of deprivation factors, including under-performing schools and the limited access to computers, internet and new technologies were considered likely to impact on the participation and academic attainment of pupils and their families in these communities.
- 7 English as a second language was also identified as a barrier for some BME groups. It was suggested that language and cultural barriers might affect BME students' HE interview performance, as well as affecting school and university achievement. Moreover, if BME students' families were not proficient English language users, their ability to support their children could be limited. Suggestions to overcome language barriers included providing application information in languages other than English or Welsh to enable BME families to access the information directly. Accessible HE information for BME families could also highlight the benefits of higher education to address issues of the real and perceived opportunity costs of remaining in full time education.
- 8 Many responses noted cultural and religious factors as potential barriers to entry to higher education. It was suggested that some BME groups might not perceive higher education as an option for their community. This attitude could be exacerbated by a lack of role models both within the student body and the teaching staff. Religious beliefs were also identified as a potential barrier with issues surrounding diet, respecting religious festivals and fasting, and access to spaces for religious observance being both available and appropriate.

SUBJECT BIAS IN ETHNIC MINORITY APPLICATIONS, RECRUITMENT AND RETENTION

- 9 One response quoted evidence from national studies such as Connor et al. (2004) which identified a BME subject bias towards computer studies, law, medicine, business studies, engineering and mathematical courses; HEFCW's own data concurs with this evidence. Below average representation by BME groups was found in education and humanities subject areas. Welsh HEI responses to the race equality impact assessment tended to also reflect this bias, though explanations for this bias were limited. Some institutions suggested that the subject bias may be due to perceived employment opportunities on graduation, or certain subjects being more highly valued by some communities.

THE EXTENT TO WHICH HIGHER EDUCATION IS ACCESSED DIFFERENTLY BY DIFFERENT RACIAL GROUPS

- 10 Few responses were made on this issue. Some noted that their institution had a statistically unviable BME sample group and were thus unable to comment. Therefore, responses in this section were from three institutions. One respondent suggested that in some cases black and other ethnic minority students, like many other students from low-income families, were not in a position to achieve the academic requirements of certain degree schemes as they tended to work longer hours in low-paid work or family businesses. It was also suggested that black and other ethnic minority students (and other students under-represented in HE) would be deterred from applying to HE from fear of debt and low expectations from graduate employment.
- 11 It was suggested that some BME communities tended to be concentrated in large urban areas and that, therefore, it should be expected that there would be concentrations of BME students in urban HEIs. A further suggestion was that some BME students might not be achieving their full academic potential and, therefore, they apply to institutions offering lower entry criteria, rather than accessing all HEIs equally. It was suggested that class and cultural issues within ethnic groups needed to be taken into consideration before clear explanations for patterns of access to HE could be provided.

GENDER AND MULTIPLE IDENTITY FACTORS WITHIN CULTURAL GROUPS

- 12 Most respondents agreed that some barriers to higher education were gender-specific for certain BME groups,. These issues were complex, for example some BME student groups might not want to work with a lecturer of the opposite sex, whilst other groups might not be comfortable with a tutor of the same sex.
- 13 Respondents suggested that barriers for some BME female students might include the lack of support or approval from their families, reluctance to permit study away from home and concerns about mixed sex student accommodation. Curriculum issues might include subjects thought unsuitable or providing progression to unacceptable occupations. Certain dress codes, for example, might prohibit some groups from undertaking teaching and drama studies.
- 14 Gay, lesbian and bisexual people of all races were identified by one respondent as being particularly disadvantaged during secondary education. These identities may exacerbate the issues affecting BME students; however it was acknowledged that further study was needed in this area.

FACTORS AFFECTING ASYLUM SEEKER, REFUGEE AND MIGRANT COMMUNITIES

- 15 Financial issues were identified as the most significant barrier to HE for asylum seekers. Institutions normally consider asylum seekers as 'overseas' students as they do not qualify as having a 'settled residence' and, therefore, are subject to higher fees. Moreover, these students were not eligible for bursaries, student loans or local authority housing benefits. The lack of funding to enter higher education, and difficulties in accessing employment after graduation, mean that higher education would often not be seen as viable option.
- 16 The status and qualifications of asylum seekers was acknowledged as a barrier to higher education. The difficulty of verifying qualifications, credit transfers or criminal record

bureau checks were often insurmountable for HEIs as asylum seekers often had no proof of prior achievements.

- 17 One respondent suggested that some asylum seekers and refugees might register with a HEI in order to favourably influence their residency application. It was recommended that clear HE application guidelines should be developed and communicated within HEIs to deal with this issue.

| EXAMPLES OF GOOD PRACTICE

- 18 A number of examples of good practice working with black and other ethnic communities which emerged from the responses included:
- The University of Glamorgan has a Refugee Discussion Forum which liaises with public and voluntary sector organisations to share expertise.
 - The University of Wales Swansea has a 'Pathways for Ethnic Minorities' programme which offers educational advice to BME communities. Contact details for the programme are available in three languages.
 - The University of Wales Newport provides 'taster' sessions such as 'An Introduction to Interpreting and Translating Skills', and work with *Ashiana* to provide sessions for Asian women in 'Women's Studies and Community Development'. In partnership with Cardiff University, it also offers 'An Introduction to Community Translation' module.
 - The Welsh College of Music and Drama offer a series of drama workshops to schools and communities with a high proportion of young people from ethnic minority communities and music workshops with young ethnic minority children from Barnardos. A series of inset training sessions is also being developed for teachers and community workers.
 - The North Wales Reaching Wider Partnership is currently undertaking a project to identify the educational needs of Eastern European migrant workers.

| OTHER ISSUES

- 19 Respondents also drew attention to the following points:
- Young, white working class males are also an ethnic minority group currently under-represented in higher education.
 - There was a need for a BME target to be set for student recruitment.
 - There may be perceived or actual racism where few HEI students come from minority ethnic groups.
 - There continued to be a lack of positive, academic and professional role models for BME groups.
 - There was need to improve race equality monitoring and staff development.
 - There was a need for HEIs to that ensure equality and diversity was a cross-cutting theme in all their strategies.
 - The need to make equality and diversity a compulsory part of the curriculum for some programmes, for example, the Teaching in HE Certificate.
 - Where HEIs have worked in partnership with other community organisations their activities have been better attended, supported by communities and more responsive to community needs.

Indicative Issues for Consideration in Providing Feedback to HEFCW's Race Equality Impact Assessment

HEFCW welcomed responses on the following questions, but information on other issues which are pertinent to policy regarding widening access was also welcomed:

- Are there barriers preventing access by certain ethnic minority groups to higher education, if so what are they?;
- Is there a subject bias in ethnic minority applications, recruitment and retention, if so what might account these trends?;
- To what extent is higher education provision accessed differentially by different racial groups and what might be the reasons for this?;
- Within cultural groups are there issues regarding the gender distribution of students accessing HE or other issues of multiple identities which should be taken account of?;
- Are there issues which need to be addressed concerning access to higher education by those from asylum seeker, refugee and migrant communities?;
- Are there Welsh examples of good practice in working with black and other ethnic minority communities which should be widely shared?;
- Are there other issues which need to be addressed in considering widening access to black and other ethnic minority groups?;
- Do you have any other comments which could contribute to this assessment?;