

# HEFCW Strategic Equality Plan

March 2020 - April 2024



Noddir gan  
**Lywodraeth Cymru**  
Sponsored by  
**Welsh Government**

## **Higher Education Funding Council for Wales (HEFCW) Strategic Equality Plan Statement**

HEFCW is a Welsh Government Sponsored Body. Our responsibilities in relation to equality and diversity includes our role as an employer, as well our work with higher education providers as they relate to their staff and students. We are subject to equalities' legislation, but we are not the regulator of equality and diversity in higher education (HE) in Wales. The [Equality and Human Rights Commission Wales](#) (EHRC Wales) is the Welsh Government's equality regulator. We have regulatory powers in other areas, including under the [Higher Education \(Wales\) 2015 Act](#), and we take account of our equalities duties when administering our regulatory powers.

We do not have powers to set equality objectives for individual higher education (HE) providers, but we take account of how their objectives contribute towards improving equality and diversity in higher education in Wales and how their objectives enable us to deliver our own equality priorities for HE. We have a long-term commitment to champion equality of opportunity and promote effective and inclusive practices in higher education.

There are many benefits to improving equality and diversity in higher education and ensuring inclusive approaches. These benefits go beyond higher education and HEFCW as an organisation, as they contribute to the social, economic, cultural and environmental well-being of Wales.

HE providers have diverse populations of staff, applicants and students, in a range of communities and settings, working in Welsh, English and other languages. We work in partnership and collaborate with them, and involve their staff and students, to secure equality of opportunity. We promote preventative approaches to achieve continuous improvement and we advise and challenge, with evidence, to tackle entrenched inequality.

As an employer, we are aware of, and seek to improve HEFCW's equality and diversity profile. This Strategic Equality Plan (the Plan) aligns with our [Corporate Strategy vision, mission and values](#). The Plan, and its underpinning delivery plan which we will publish separately, sets out how we will take our work forward in the short, medium and long-term.

We recognise the advantages of engaging a wide range of people in the development and implementation of our Plan. This Plan is an evolving document and we will review it to ensure it remains fit for purpose.

**David Blaney**  
**Chief Executive**

## **HEFCW's strategic vision:**

### **HEFCW's strategic vision as set out in our Corporate Strategy is:**

Sustainable, accessible, internationally excellent higher education in Wales

HEFCW's Strategic Equality Plan (SEP) contributes to achieving our vision. The four high-level equality and diversity objectives are aligned with our corporate objective themes<sup>1</sup>.

Our four high-level Strategic Equality Plan objectives are:

#### **We fund:**

To ensure higher education in Wales is sustainable and accessible for all who could benefit from it and/or work in it.

#### **We regulate:**

To secure equality of opportunity and equity of outcomes in higher education.

#### **We collaborate:**

To work in partnership to influence and promote equality and diversity in higher education.

#### **We operate effectively:**

To ensure that equality is at the heart of all we do as an organisation.

In developing this plan we have taken account of the Welsh Government's draft Strategic Equality Plan short- and long-term aims and objectives. The Welsh Government is consulting on the enactment of a socio-economic duty under the Equality Act 2010. While HEFCW and HE providers are not subject to this duty, we will take account of socio-economic factors in our ways of working. Furthermore, we have:

- considered the implications of the [Well-being of Future Generation \(Wales\) Act 2015](#), well-being goals, the ways of working and the sustainable development principle;
- published, and will continue to review, [HEFCW's Well-being Statement](#) to inform this Strategic Equality Plan and its implementation; and
- collaborated with other Welsh Public Bodies<sup>2</sup> to ensure an integrated and coordinated approach to positively challenge and address inequality across the public sector in Wales.
- Consulted on our draft 2020-24 SEP see [HEFCW circular W20/02HE](#).

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<sup>1</sup> In pursuing our corporate strategic vision, our mission is to: fund higher education in Wales; regulate higher education providers in Wales; influence higher education with evidence-based advice and strong partnership working; work in partnership with students; and operate effectively as an organisation.

<sup>2</sup>Wales's Public Body Equality Partnership: Natural Resources Wales, Arts Council of Wales, National Museum Wales, HEFCW, Welsh Language Commissioner, Careers Wales, Welsh Revenue Authority, Health Education and Improvement Wales (HEIW), Sport Wales, Cardiff and Vale University Health Board and Velindre University NHS Trust.

- considered the equality of treatment of the Welsh and English languages in conducting our public business in Wales, and our role in facilitating a bilingual working environment for staff in developing this plan.
- set out our priorities for action under each of the four Strategic Equality Plan objectives detailed above, to ensure equality and diversity is embedded in all that we do.

### **Objective 1:**

**We fund: to ensure higher education in Wales is sustainable and accessible for all who could benefit from it and/or work in it.**

### **Short-term priorities**

We will:

- Review our funding methodology, including part-time funding, taking account of the needs of students with protected characteristics and those in receipt of disabled students' allowances. *(by 2021)*
- Monitor the impact and use of our funding allocations, including through formal impact assessment processes. *(throughout the strategy period)*
- Fund the Reaching Wider (RW) Programme and its support of under-represented groups in HE as set out in [HEFCW's Reaching Wider Programme guidance](#). *(current RW strategy period 2018/19 to 2021/22)*
- Manage well-being and health, including mental health funded projects to improve the student and staff experience. *(by 2022)*
- Fund and manage the [GO Wales: Achieve through Work Experience Programme](#) to support work experience opportunities provided to groups under-represented in HE, including those with protected characteristics as defined by the GO Wales business plan. *(throughout the strategy period)*
- Fund higher-level apprenticeships and monitor the recruitment, retention and success of under-represented groups on degree apprenticeships. *(throughout the strategy period)*
- Support institutions to fund Postgraduate Taught Master's Bursaries for students aged 60 years or over. *(throughout the strategy period)*

## **Objective 2:**

**We regulate: to secure equality of opportunity and equity of outcomes in higher education.**

### **Short-term priorities**

We will:

- Approve, or otherwise, fee and access plans submitted to us to secure equality of opportunity and the promotion of higher education. *(throughout the strategy period)*
- Evaluate fee and access plan activities and services to identify and promote the most effective ways of securing equality of opportunity and equity of outcomes. *(throughout the strategy period)*
- Intervene to secure compliance, where appropriate, in line with our statutory duties for regulation, including under [Prevent](#) and the [Higher Education \(Wales\) Act 2015 legislation](#). *(throughout the strategy period)*
- Monitor HE providers' public good statements relating to equal opportunity commitments. *(throughout the strategy period)*
- Use our annual assurance processes<sup>3</sup> to improve performance in equality and diversity, including through:
  - Institutional Risk Review;
  - Institutional Assurance Review Visits; and
  - Annual Assurance Returns. *(throughout the strategy period)*
- Review HE providers' strategic equality plans, annual equality reports and related equalities data to inform our risk assessment and assurance processes, our own strategic equality objectives and to challenge performance in this area. *(throughout the strategy period)*

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<sup>3</sup> Each of these processes seeks assurances relating to aspects of equality and diversity such as ensuring appropriate consideration of Governing Body diversity, monitoring performance against widening access targets and learner outcomes. Deficiencies in these areas could result in HEFCW requiring corrective action to be undertaken.

### Objective 3:

**We collaborate: to work in partnership to influence and promote equality and diversity in higher education.**

#### Short-term priorities

We will

- Work with HE providers to secure action on addressing pay gaps<sup>4</sup>. *(throughout the strategy period)*
- Challenge HE providers to make progress on reducing student attainment gaps<sup>5</sup> and improve differential attainment<sup>6</sup>. *(by 2021)*
- Work with HE providers in their response to relevant research and publications including from [Welsh Government](#), the [Equality and Human Rights Commission](#), [Universities UK](#), [Advance HE](#) and others. *(throughout the strategy period)*
- Work with partners to develop and implement [HEFCW's Policy Statement on Well-being and Health in HE](#), including the development of underpinning co-created action plans for staff and students. *(throughout the strategy period)*
- Promote and share effective practice in equality and diversity for staff and students in higher education. *(throughout the strategy period)*
- Promote the values of the [Researcher Development Concordat](#), encouraging universities in Wales to become signatories of the Concordat and for them to create action plans that will embed the principles of supported careers across the sector. *(throughout the strategy period)*
- Review well-being and health strategies and monitor progress. *(throughout the strategy period)*
- Audit and publish guidance and effective practice on supporting refugees and asylum seekers in higher education, including as this relates to HE staff and students. *(by 2020)*
- Publish guidance and good practice case studies on tackling violence against women, domestic abuse and sexual violence. *(throughout the strategy period)*
- Work with Welsh Government, Universities UK, Advance HE and other partners to contribute to their strategies and plans and progress our commitments to equality and diversity, including tackling violence against women domestic abuse and sexual violence. *(throughout the strategy period)*

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4 [Is Wales Fairer 2018](#), p132

5 [Is Wales Fairer 2018](#), p8

6 Across protected characteristics and socio-economic areas

- Monitor and challenge HE providers on gender equality and participation by gender in Science, Technology, Engineering and Mathematics (STEM) and other subjects, where there are known gender inequalities<sup>7</sup>. *(throughout the strategy period)*
- Monitor HE providers' [Athena SWAN](#) performance. *(throughout the strategy period)*
- Work with the Welsh Government and partners on the review and implementation of a revised [Public Sector Equality Duty](#) (PSED). *(throughout the strategy period)*
- Challenge and support HE providers on the diversity of their governing body. *(throughout the strategy period)*
- Monitor the implementation of [REF Codes of Practice](#) to ensure fairness and inclusivity in the development of REF submissions. *(throughout the strategy period)*
- Monitor HE providers' achievement in UK equality related awards and charters.

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<sup>7</sup> HESA trend data

## **Objective 4:**

**We operate effectively: to ensure that equality is at the heart of all we do as an organisation.**

In developing Objective 4, HEFCW has worked collaboratively with the Wales's Public Body Equality Partnership<sup>8</sup> to establish joint priorities that align with the Welsh Government's draft long-term aims for Wales. Additionally, there are also HEFCW-specific objectives.

### **Short-term priorities**

We will:

- Ensure HEFCW is fully compliant with the Equality Act and the Public Sector Equality Duty. *(throughout the strategy period)*
- Progress HEFCW remit letter requirements that relate to equality and diversity, including well-being and health and mental health. *(throughout the strategy period)*
- Review our Well-being Statement and objectives. *(throughout the strategy period)*
- Contribute to the development of the [Commission for Tertiary Education and Research \(CTER\)](#), including as it relates to equality and diversity. *(throughout the strategy period)*
- Develop HEFCW's action plan to embed the relevant core principles of the [Researcher Development Concordat](#), including increasing engagement with early career researchers. *(throughout the strategy period)*
- Respond effectively to the HEFCW-related recommendations in relevant reviews, including the Equality and Human Rights Commission's report: [Tackling Racial Harassment: Universities Challenged](#). *(throughout the strategy period)*
- Ensure HEFCW is fully compliant with website accessibility requirements for public sector bodies *(by September 2020)*.

**HEFCW commits to the following Wales Public Body Equality Partnership Strategic Equality Plan priorities, as set out below:**

- Increase workforce diversity and inclusion, we will align our own employment data reporting to match that of the Welsh Government in both format and reporting dates and evidence of how engage with minority groups and those living in poverty to gain employment with us. *(throughout the strategy period)*
- Work towards eliminating pay gaps, ensure accurate data across the public sector that enables analysis (across protected characteristics) \* and publish action plans to address any pay gaps identified. *(throughout the strategy period)*

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<sup>8</sup> Wales's Public Body Equality Partnership membership: Natural Resources Wales, Arts Council of Wales, National Museum Wales, HEFCW, Welsh Language Commissioner, Careers Wales, Welsh Revenue Authority, HEIW, Sport Wales, Cardiff and Vale University Health Board and Velindre University NHS Trust.

- Demonstrate and evidence engagement and co-production of our strategies, policies, service changes and decisions. (*throughout the strategy period*)
- Ensure equality is embedded into procurement / commissioning process. (*throughout the strategy period*)

**In developing our short-term outcomes, medium-term milestones and long-term ambitions we have worked collaboratively with the Wales Public Body Equality Partnership<sup>9</sup> to establish joint priorities that align with the Welsh Government's long-term aims for Wales as set out in its draft Strategic Equality Plan.**

### **By the end of the Strategic Equality Plan 2020-24 period**

*Through our processes, including working with the HE providers, we will:*

- ✓ be fully compliant with the Public Sector Equality Duty as an organisation;
- ✓ challenge higher education institutions to be fully compliant with the Public Sector Equality Duty
- ✓ ensure the Wellbeing of Future Generations Act principle, [goals and ways of working](#) inform equality and diversity policy development and implementation;
- ✓ ensure the Commission for Tertiary Education and Research (when established) protects and promotes equality and diversity in post-16 education;
- ✓ deliver our short-term priorities and report annually on them;
- ✓ assess our progress and performance regularly;
- ✓ ensure policies are enhanced by effective impact assessment;
- ✓ ensure our processes are fair and equitable, including procurement processes;
- ✓ build equality and diversity explicitly into regulatory processes, in line with our statutory duties;
- ✓ demonstrate our contribution towards the Wales Public Body Equality Partnership short-term priorities;
- ✓ collaborate more effectively and more widely;
- ✓ extend opportunities for inclusive engagement;
- ✓ share practice to enhance performance.

*For staff and student populations with protected characteristics, we will work within our organisation and with HE providers to:*

- ✓ work towards increasing the diversity of staff and student populations;
- ✓ champion equality of opportunity and equity of outcomes;
- ✓ increase the diversity of governing bodies;
- ✓ address pay and attainment gaps;
- ✓ challenge barriers to fair access, a positive student experience and equity of outcomes;
- ✓ challenge employment practices that demonstrate unfair practice for people with protected characteristics;
- ✓ promote inclusive cultures and communities free from identity-based abuse;
- ✓ support staff and student well-being and health, including mental health.

*Informed by intelligence we will:*

- ✓ align our equalities data reporting with appropriate national reporting protocols;
- ✓ extend the equalities evidence-base;
- ✓ improve our use of equalities data;
- ✓ evaluate progress against HE providers' strategic equality plans and annual reporting;
- ✓ challenge the pace of progress and performance.

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<sup>9</sup> Wales's Public Body Equality Partnership membership: Natural Resources Wales, Arts Council of Wales, National Museum Wales, HEFCW, Welsh Language Commissioner, Careers Wales, Welsh Revenue Authority, HEIW, Sport Wales, Cardiff and Vale University Health Board and Velindre University NHS Trust.

**Our medium-term milestones inform assessment of progress towards our long-term outcomes. To make further progress:**

*Through our processes, we will:*

- ✓ model good practice in supporting equality and diversity as an organisation and HE sector;
- ✓ ensure the Future Generations Act principle, goals and ways of working inform equality and diversity policy development and implementation;
- ✓ ensure the Commission for Tertiary Education and Research protects and promotes equality and diversity in post-16 education;
- ✓ evaluate progress against our Strategic Equality Plan;
- ✓ publish a Strategic Equality Plan 2025-2029 informed by progress against objectives;
- ✓ set challenging short-term priorities;
- ✓ evidence our progress and performance;
- ✓ ensure impact assessment processes provide robust policy scrutiny;
- ✓ ensure process implementation is fair and equitable, including procurement processes;
- ✓ ensure regulatory processes are informed by equality and diversity considerations, as appropriate;
- ✓ demonstrate our contribution towards the Wales Public Body Equality Partnership long-term priorities;
- ✓ share practice to enhance performance

*For staff and student populations with protected characteristics, we will work within our organisation and with HE providers to:*

- ✓ increase the diversity of staff and student populations;
- ✓ champion equality of opportunity and equity of outcomes;
- ✓ address diversity of governing bodies across protected characteristics;
- ✓ challenge address pay and attainment gaps;
- ✓ challenge barriers to fair access, a positive student experience and equity of outcomes;
- ✓ challenge employment practices that demonstrate unfair practice for people with protected characteristics;
- ✓ promote inclusive cultures and communities free from identity-based abuse;
- ✓ support staff and student well-being and health, including mental health.

*Informed by intelligence we will:*

- ✓ Strengthen and extend monitoring with improved data and reduced gaps;
- ✓ Challenge with improved evidence unsatisfactory progress and performance;
- ✓ Highlight effective practice in supporting staff and students with protected characteristics;

**Our long-term (beyond 2035) ambitions are the result of our short-term priorities and medium-term milestones. Our ambitions align with the Welsh Government's long-term ambitions for Wales as set out in its Strategic Equality Plan 2020-24<sup>10</sup> and contribute to:**

- ✓ fulfilling our vision for HE 'sustainable, accessible, internationally excellent higher education in Wales'
- ✓ improving the social, cultural, environmental and economic well-being of Wales;
- ✓ securing the elimination of identity-based abuse, harassment, hate crime and bullying in HE and in our organisation;
- ✓ ensuring that 'the needs and rights of people who share protected characteristics are at the forefront of the design and delivery of all public services in Wales'.\*
- ✓ ensuring that 'Wales is a world leader for gender equality'.\*
- ✓ ensuring that 'the Welsh public sector leads the way as exemplar inclusive and diverse organisations and employers'.\*
- ✓ meeting the long-term priorities of the Wales Public Body Equality Partnership.

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<sup>10</sup> The Welsh Government's Strategic Equality Plan 2020-24 was in draft form as we finalised our Plan. The Welsh Government long-term aims for Wales are indicated as \*.

## Data sources we will use to monitor progress (indicative, not exhaustive)

- Welsh Government, Universities UK, Equality and Human Rights Commission and other relevant publications
- [HESA Data](#) (monitored across all protected characteristics where possible)
- Employment and workforce equality and diversity data at institutional level
- Institutional level attainment gap data
- STEM data at institutional-, national- and UK-level
- HEFCW employment data
- Institutional governing body data
- Institutional Equality Impact Assessments for the Research Excellence Framework
- [Advance HE statistical data](#)
- [HEFCW's National Measures](#)
- Welsh Government Welsh Index of Multiple Deprivation (WIMD)

## Legislative and policy context

In developing our 2020-2024 SEP and equality objectives we have considered the following legislation and policies:

The [Equality Act 2010](#) (the Act) and the Public Sector Equality Duty (PSED). The Act places a duty on public sector bodies such as HEFCW. In the exercise of its functions, a public body must have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The general duty covers nine protected characteristics.<sup>11</sup>

The Public Sector Equality Duty (April 2011) is underpinned by specific duties contained within the [Equality Act 2010 \(Statutory Duties\) \(Wales\) Regulations 2011](#). Welsh HEIs, and the Higher Education Funding Council for Wales (HEFCW), are covered by the equality duty.

The aim of the Public Sector Equality Duty (PSED) is to ensure that public bodies and those carrying out a public function consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities. The duty ensures that equality considerations are built into the design of policies and the delivery of services and that they are kept under review to achieve better outcomes for all.

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<sup>11</sup> Age, Disability, Gender reassignment, Pregnancy and maternity, Marriage and civil partnership (in respect of the requirement to have due regard to the need to eliminate discrimination), Race, Religion and belief, Sex and Sexual orientation.

## The [Well-being of Future Generations \(Wales\) Act 2015](#)

The Act seeks to improve the social, economic, environmental and cultural well-being of Wales. The Act encourages public bodies, such as HEFCW, to think more about the long term, work better with people, communities and each other, to look to prevent problems and to ensure more 'joined-up' approaches to all that they do.

In developing the 2020-2024 SEP, HEFCW has considered the implications of the Act's well-being goals, ways of working and the sustainable development principle.

The [Violence Against Women, Domestic Abuse and Sexual Violence \(Wales\) Act 2015](#) (VAWDASV) aims to improve prevention, protection and support for those affected by violence against women, domestic abuse and sexual abuse and to improve the public sector response to it. HEFCW and Higher Education Institutions are not 'relevant authorities' within the Act, however the Act states 'HEFCW may issue guidance to the governing bodies of institutions in Wales within the higher education sector on how the bodies may contribute to the pursuit of the purpose of this Act'.

### Policy considerations

- The Strategic Equality plan (SEP) has been informed by the following policy considerations:
- Equality and Human Rights Commission [Is Wales Fairer? \(2018\)](#)
- Welsh Government [Well-being of Wales 2017-18 \(2018\)](#)
- Equality and Human Rights Commission [Freedom of expression guide for higher education providers and students' unions in England and Wales \(2018\)](#)
- Welsh Government [Nation of Sanctuary – Refugee and Asylum Seeker Plan \(2019\)](#)
- Equality and Human Rights Commission [Tackling racial harassment: Universities challenged \(2019\)](#)
- [HEFCW's Well-being and Health in Higher Education Policy Statement \(2019\)](#)
- HEFCW Corporate Strategy 2016-2020
- HEFCW remit letter tasks that relate to equality and diversity.
- The Welsh Language (Wales) Measure 2011 and Welsh Language Standards (No 6) Regulations 2017.

## Horizon scanning

### **Our Strategic Equality Plan implementation will take account of the following developments:**

During the 2020-2024 strategy period Welsh Government will be commissioning and publishing the following research reviews:

- Commissioning research to explore wider options, including how they might incorporate UN conventions, including the convention on the rights of disabled people, into Welsh law.
- Undertaking a review of the Equality Duty 2011 (Wales) regulations and how they could be strengthened.
- Review of the Evidence of Inequality in Wales (Welsh Government), due to be published by the end of 2019.
- Review of Gender Equality Phase Two report and roadmap ([Chwarae Teg](#)), due to be published by the end of 2019.