



## **Equality Impact Assessment Position Paper**

### **1. Overview**

Coatbridge College (“the College”) has a commitment to embedding equality and diversity in all of its activities. This is both a statutory and a strategic commitment; including a consideration of equality in the organisation’s services is not simply a matter of compliance with legislation – it is a way of ensuring that the College itself creates an environment where staff and students can reach their potential and which is free from harassment and promotes equality of opportunity.

Considering the impact of the College’s policies and practices on different groups of people is not a “new” process for the College – meeting the needs of a diverse group of people, and improving services for those people is already a priority for the College. The duty to undertake impact assessments simply means that the College needs to do this in a more systematic way so that the College can provide evidence that it is meeting its legal obligations.

This Position Paper considers the legal requirement to impact assess, reviews the current practice at the College and suggests a timetable for the College to systematically embed this process.

### **2. Duty to Impact Assess**

The public equality duties with regards to race, gender and disability include the obligation to impact assess practices and policies to ensure that they are not discriminating against equality groups, and that equality is promoted wherever possible. In practical terms, it is a way of making sure that services are improved so that everyone can receive equal benefit.

The statutory duty to impact assess currently covers only the three equality areas of race, gender and disability. The Single Equality Bill should extend this duty to cover sexual orientation, religious belief and age discrimination. The Single Equality Bill should be implemented by 2011, by which time the College will extend this process to include all equality strands.

In the meantime, the College intends to change its information systems to capture monitoring data in respect of sexual orientation and religious belief

and continue to prevent discrimination and promote equality in these areas by implementation of the College's Equality, Diversity & Inclusion Policy.

### **3. Objectives of Process**

The College wish to implement a transparent process which is based on a "best practice" approach. The process must be consultative, whereby staff, students and partners are involved in the design and outcomes of the assessments. It is also important that by the end of the implementation process, staff are competent in producing their own assessments, and therefore capability building through training has been built into the agenda.

The College met with a number of independent specialist consultants, and have appointed Fraser Consulting to review current practice and assist with the introduction of this process within the College.

### **4. Review of Current Practice**

An impact assessment scrutinises a particular area of activities to identify if there is any potential or actual negative impact on an equality group. If this is the case, an organisation should take action to minimise that impact, as well as considering ways to further promote equality.

While the College has not yet implemented a formal assessment process, much work has been done on minimising negative impacts, and considering ways to further promote equality. Some examples of this include:

- Redesign of College website – the College recognised that its website is a key tool in attracting students and publicising the range of services which the College offers. However, there was potentially a negative impact on people with a disability, as the website was not fully accessible. Having identified a negative impact on an equality group, the College redesigned the content and format of its website in 2008. The redesign achieved the highest web accessibility conformance level (AAA) and since then, has revised the content of its Equality web pages to further promote equality and the services which are available for all students.
- Launch of the Commitment Centre - with regards to retention, the College understands that students will additional support needs, for example, students with mental health issues, have a higher rate of withdrawal. This is also true for students with caring responsibilities. This negative impact on equality groups was part of the decision to launch the Commitment Centre, where Learning Support and

Student Support Services ensure that communication is made with students at risk of withdrawal. The Centre offers tailored support and encouragement for these students to continue their education at the College.

- The College is aware of its duty to make anticipatory adjustments for people with a disability, and reviewed the accessibility of its estate in 2007. The review highlighted a need to improve accessibility, as only 35% of the whole estate was accessible to people with limited mobility. This review constituted an impact assessment of the existing estate, and informed the College's New Campus Project, which will ensure a fully accessible College which complies with the Disability Discrimination Act.

## **5. Method of Assessment**

The College has outlined the method of assessment it will use in the College's Race, Gender and Disability Equality Schemes. In summary:

### Stage 1: Screen the practice area for relevance to equality

The College will decide which practices are priorities for ensuring that equality of opportunity is provided and promoted.

### Stage 2: Gathering Information and Facilitating Involvement

The College will establish what information has been collected, and what information needs to be collected. The evidence which will be used includes:

- The College's monitoring data
- Census data
- Data from the Scottish Funding Council
- Results from formal involvement and consultation activities
- External research
- Information from particular groups and organisations working directly with particular equality groups

In terms of involvement and consultation, the College recognises that consultation is a crucial step in this process, and goes beyond simply informing people of what will happen. Instead, it will help the College to fully determine the impact of a practice, and involve people in deciding the best way forward.

### Stage 3: Assess Impact

The College will assess and analyse the practice in terms of the positive or negative impact it may have and its potential to cause unlawful direct or indirect discrimination, or whether any opportunities to promote equality have been missed. Draft assessments will be distributed to staff, students and partners.

### Stage 4: Action Planning

The College will establish what practical actions are required to reduce or remove any adverse or negative impact and what actions will be taken to help promote equality. Action points will be developed and added to the College's Equality Schemes, and the College's Equality and Diversity Committee will ensure that action takes place, and will report on action taken.

In order to ensure a transparent process, all documentation will be published on the College's website.

## **6. Deciding On Priorities**

The College wishes to ensure that this is not a "tick box" exercise, and that the results of assessments facilitate real change. With this in mind, the College has considered which areas are highly relevant in ensuring equality of opportunity, and should be assessed as a priority. This consideration was based on:

- The College's Mission Statement, namely: "To place learners at the heart of everything we do". This emphasizes the focus on the College on developing and providing support for learners.
- The College's Strategic Plan, in which a key activity is to increase the retention, achievement and attainment of learners across the curriculum. The Plan also states an intention to target appropriate provision at people in disadvantaged communities, and those at greatest risk of social exclusion.
- The purpose of Further Education in general, which is based on enabling and equipping learners to deploy to their best effect their talent, knowledge, resourcefulness and creativity.

Taking this into account, the College wishes to focus on the following areas in this process:

- (a) Recruitment of Students: ensuring that students from all equality groups are attracted to the College, aware of the additional support services available, and do not suffer any detriment at application.

This assessment will include a review of the College's website, prospectus and other promotional material.

- (b) Attainment: ensuring that students from all equality groups are receiving the support they need to achieve their full potential, and that adjustments are made to minimize any negative impacts.
- (c) Retention: ensuring that students from all equality groups are receiving the support they need to continue their education at the College. Internal and external research shows that particular equality groups, including people with a disability, tend to have a higher withdrawal rate. The College wishes to address this and mitigate any negative impact.
- (d) Complaints: ensuring an environment where students can prosper without risk of harassment or discrimination.
- (e) Recruitment of Staff: ensuring that the College is doing the best it can to provide a diverse work force which will further embed equality in the curriculum.
- (f) Staff Grievances and Disciplinary Actions: ensuring an environment where staff can work without risk of harassment.

These areas have therefore been identified as highly relevant, and as part of the consultation process, the College invites comments on whether these areas are appropriate, and which further areas can be added to the process.

## **7. Progress and Future Plans**

In the identification of the highly relevant areas to be assessed, the College has carried out Stage 1 of this process. The College has also made progress with Stage 2, where a document identifying the information which is needed to carry out full assessments has been produced and distributed internally.

The Appendix details the future implementation plans of the College, where ultimately the process will be produced by the end of October 2009.

**The College wishes to emphasise how important consultation is in this process. If you have any comments about this process, including the areas which have been identified as a priority, please contact [clare.fraser@fraserconsulting.co.uk](mailto:clare.fraser@fraserconsulting.co.uk)**

## Appendix: Coatbridge College: EQIA Implementation Agenda

	Action	To be Achieved By (2009)	Outcome
1	Communicate purpose of process to all staff: <ul style="list-style-type: none"> <li>• Publish EQIA position paper</li> <li>• Ask staff for their views on priorities</li> <li>• Ask staff to get involved</li> </ul>	21 <sup>st</sup> August	Staff will have understanding of process and importance in terms of embedding equality. Staff will contribute to the decision regarding priority of areas to be assessed.
2.	Data Gathering: <ul style="list-style-type: none"> <li>• Information identified is gathered by College</li> </ul>	18 <sup>th</sup> October	The assessment process will be based on accurate and comprehensive data.
3.	Initial Assessment <ul style="list-style-type: none"> <li>• Draft assessments to be produced by CF and distributed to College</li> </ul>	30 <sup>th</sup> October	The college data will be analysed externally by a specialist consultant.
4.	Consultation <ul style="list-style-type: none"> <li>• With staff – by email and focus group</li> <li>• With students – by email, on plasma screens, with Student's Union and by focus group</li> <li>• With external partners, eg SFC, ECHR</li> </ul>	7 November	Consultation will ask for views on the findings to date, and how the College can continue to promote equality and prevent discrimination.
5.	Training for Senior Staff	Mid November	This training will enable staff to carry out future EQIA's. It will also be part of the consultation process, as during the training, staff will be asked to comment on draft assessments.
6.	Final Assessments <ul style="list-style-type: none"> <li>• To be published on website</li> <li>• Action points will be added to the College's Equality Schemes</li> </ul>	30 <sup>th</sup> November	The College will have produced an evidence based assessment of key areas which complies with legislation. This assessment will be embedded into College activities through the College's Equality Schemes.