

Developing staff disclosure

A guide to collecting and using
equality data



Equality Challenge Unit

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- = University of Birmingham
- = Canterbury Christ Church University
- = University of Hull
- = University of Leeds
- = Oxford Brookes University
- = University of Salford
- = Sheffield Hallam University.

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1 About the project

1.1 Introduction

This guidance provides practical advice for higher education institutions (HEIs) on encouraging and enabling the disclosure by staff members of equality-related data (for example information about their gender, ethnic origin, disability status, sexual orientation, religion or age), and provides information on how these data can and should be used. In this document we refer to this area of work as 'staff disclosure'.

The guidance is structured as follows:

- ⇒ Section 1 explains the background and methodology used in ECU's staff disclosure project.
- ⇒ Section 2 sets out the main reasons for collecting data and explains the importance of HEIs creating an inclusive and supportive workplace in which staff members feel comfortable to disclose equality-related information about themselves. It also discusses some of the key differences between staff disclosure issues as they relate to different equality strands.
- ⇒ Section 3 discusses some of the practical methods HEIs can use to enable and encourage staff disclosure.
- ⇒ Section 4 provides practical advice for HEIs on how to make use of the staff disclosure statistics that are collated.
- ⇒ Section 5 presents illustrative case studies from HEIs that have contributed to ECU's disclosure project.

We also provide further practical information and case studies in the appendices:

- ⇒ Appendix A is a checklist for HEIs to use when developing an institution-wide action plan on staff disclosure
- ⇒ Appendix B is a template for such an action plan
- ⇒ Appendix C provides a variety of references and resources that are relevant to issues of staff disclosure.

1.2 Background

In 2007 ECU conducted research to investigate staff disclosure in HEIs (ECU, 2008a, 2008b). This work looked at the support received by disabled staff, barriers they experienced, and the factors influencing whether or not staff disclose their

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disability status. In addition, other observations and developments have led ECU to identify the need for more support to HEIs on the subject of staff disclosure. These include:

- = the significant proportion of staff in many HEIs who choose not to disclose their ethnic origin or disability status in the data returned annually by HEIs to the Higher Education Statistics Agency (HESA), which affects the statistical significance of the data
- = the level of interest in staff disclosure issues on the main equality and diversity online discussion group for the higher education sector (the ADMIN-EO mailing list accessed via www.jiscmail.ac.uk)
- = media coverage of difficulties involved in staff disclosure
- = discussions with union partners
- = the observation that other guidance on disability disclosure in higher education has tended to focus on student rather than staff disclosure
- = a growing emphasis on ensuring equality and diversity work is properly evidenced
- = a recommendation from the Commission for Disabled Staff in Lifelong Learning.

1.3 Methodology

Research stage

ECU conducted a literary review of existing publications relating to staff disclosure, analysing the sourced publications for recommendations and using these, along with ECU's previous research, as a basis for concentrating on a range of disclosure interventions. The interventions were divided into four categories:

- = improving clarity on disclosure and data quality
- = improving communication and engagement in disclosure and equality
- = implementing equality in recruitment and retention
- = achieving behavioural and cultural change through developing supportive structures.

The results of this literary review are published in *Interventions for staff disclosure in higher education: background paper 2009* (ECU, 2009a).

Development stage

In April 2008, ECU put out a call for expressions of interest from HEIs interested in improving their disclosure rates to participate in a project to pilot a range of ECU-identified interventions. ECU received a good response to this request, and staff from the HEIs were invited to one of two meetings in summer 2008, at which there were constructive discussions on the barriers to staff disclosure in higher education.

ECU invited the HEIs to pilot interventions and develop an action plan, detailing:

- = the interventions being piloted
- = actions planned to deliver the interventions' outcomes
- = the date by which the intervention would be implemented
- = who would be responsible for ensuring this
- = what the measures of success would be after implementation.

Piloting stage

Of those who attended the meetings, eight HEIs volunteered to pilot interventions. This phase of the project took place between September 2008 and June 2009. With limits on time and available resources, the individual HEIs did not pilot all interventions, but chose one or more interventions from each category.

ECU convened a meeting in spring 2009 to discuss the achievements to date, and the benefits and challenges that had been identified through piloting the chosen interventions. In June the HEIs submitted their final reports, updating on the progress they had made. Section 5 of this guidance presents case studies of the participating HEIs.

Although the project initially set out to look at disclosure relating to disability, ethnicity, religion and sexual orientation, the pilot HEIs were concerned primarily with improving levels of disability disclosure. As a result, the case studies and practical advice in this guidance predominantly focus on disability. However, where possible this publication looks beyond disability issues, and many of the good practice examples would be easily transferable to other areas of staff disclosure.

The pilot HEIs produced a range of outputs during the project which are available on the ECU website at www.ecu.ac.uk/inclusive-practice.

2 Understanding the case for collecting data from staff

2.1 Benefits for staff members and HEIs

For any HEI looking to work towards improving its staff disclosure rates, it is important to understand why disclosure is being sought. It is also important to consider the benefits that can be achieved for both the institution and the individual staff member through greater disclosure.

For staff, the benefits in disclosing equality-related information about themselves include:

- = scope for prompting a discussion with their employer about disability-related reasonable adjustments or other workplace support that they might require
- = the ability to receive targeted information about support or positive action initiatives, such as development programmes for staff from under-represented groups
- = contributing to a pool of information that will help the institution meet the diverse needs of staff (for example in relation to provision of catering options or facilities for prayer or contemplation).

Staff may also receive increased legal protection by disclosing such information to their employer: in some cases an employer may be placed under an increased obligation to protect staff from discrimination if it has received disclosure information from a staff member, for example about their disability status, or holds broader evidence of the diversity of its workforce.

Certain types of monitoring or staff disclosure procedures are compulsory for HEIs, either to satisfy legal requirements or to meet the reporting requirements of organisations such as HESA. In addition, proactively collecting disclosure data from its workforce can deliver many other benefits and advantages for an HEI. These institutional benefits include:

- = a clear picture of the composition of the HEI's workforce – to assist with planning of facilities, support structures or staff networks and to enable the HEI to meet the diverse requirements and expectations of its workforce

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- = high-quality monitoring data, which can be cross-referenced with other staff data (e.g. training attendance data, salary information) to provide an indication of whether some groups of staff are potentially being disadvantaged
- = a clear indication of which individual staff members should be offered a discussion about disability-related support or adjustments
- = the ability to target particular groups of staff members with information about relevant positive action initiatives or staff networks.

Effective monitoring and disclosure processes will also send a signal to staff and potential job applicants that an HEI is committed to equality and to supporting a diverse workforce.

2.2 Key differences between equality strands

When an HEI considers what its priority actions are, it is important to be aware of the key differences between equality strands in relation to staff disclosure issues. It will often be appropriate to monitor the key equality strands (age, ethnicity, disability, gender, religion or belief, and sexual orientation) in the same way, to avoid inadvertently sending a message that an HEI has a hierarchical approach to equality and diversity. However, ECU recognises that some HEIs have concerns about asking staff for information in some of these areas.

This section provides an introduction to some of the key differences between the different equality strands. Section 3.4 provides further guidance on using inclusive language when framing disclosure questions.

Age

In HEIs, it is likely that comprehensive age data will be available and reliable for current staff, as human resources (HR) systems generally record people's date of birth. When analysing data by age, it is usual to group the data into, for example, five- or ten-year blocks to make it easier to draw conclusions. In many cases, it can also be useful to develop an institution-wide approach to which groupings will be used when working with age data, to ensure the comparability of different data sets. When collecting age data from job applicants, HEIs may have a system in place for extracting age information from the date-of-birth question on application forms; and/or HEIs may decide to incorporate a date-of-birth or age question within a separate equality monitoring form.

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Reviewing the information that has been collected on staff age groupings can be extremely helpful in identifying support that staff require through different stages of their employment life cycle, for example, take-up of training and development, flexible working opportunities, or the provision of occupational health support to older workers. Profiling staff expectations by age will become increasingly important as the government reviews the default retirement age of 65 in 2010.

Disability

Asking staff about whether or not they are disabled is important in terms of delivering disability monitoring data to inform policy or decision-making. Asking this question will also be crucial in terms of enabling HEIs to contact individual disabled job applicants or staff members to offer them an opportunity to discuss any disability-related adjustments or support they may require. It is important to note that disability monitoring is a requirement of the specific duties of the Disability Equality Duty contained within the Disability Discrimination Act 1995 (as amended) (HM Government, 2005a), and set out in the Disability Discrimination (Public Authority Statutory Duties) Regulations 2005 [SI2966] (HM Government, 2005b).

As with all disclosure data, it is vital that employers are clear and straightforward about the ways in which disability information about individuals will be used. Otherwise, for example, a staff member may disclose a disability and reasonably assume that the disclosure will prompt a discussion about disability support, when in fact the data are being used only for anonymous monitoring purposes.

When asking a question about disability status, it is common to provide a clear definition of disability (perhaps based on the definition contained within the Disability Discrimination Act 1995), as many people may not be aware of the broad nature of this definition or the fact that it will cover many people with conditions such as dyslexia, long-term mental health conditions or long-term medical conditions.

As well as asking staff whether or not they consider themselves to be disabled, many HEIs ask a further question of those who disclose a disability in order to seek more detailed information about the nature of the person's disability (asking, for example, whether the person is blind or partially sighted, has a physical or mobility impairment, etc.).

Ethnicity

Including questions on ethnicity for job applicants and current staff is fairly standard, particularly since, under the Race Relations (Amendment) Act 2000 (HM Government, 2000), duties are placed on HEIs and other public bodies to carry out ethnic monitoring in a range of different areas. Framing a question on ethnicity can be difficult, particularly given that the way in which someone views their ethnic origin, colour or national identity will often be individual to them. While there is no perfect question to use when asking staff about their ethnicity, there is often merit in adopting the same question that is used within the ten-yearly national Census, to enable meaningful comparisons to be made between the composition of an HEI workforce and local or national population statistics. It is not uncommon for HEIs, when analysing ethnicity data, to group the data into broader categories, such as 'black and minority ethnic (BME) staff', often to ensure sample sizes are large enough to be significant and also to avoid identifying individual staff members in reports. However, such broad headings are not usually featured in the monitoring questions themselves. If your HEI groups data together in this way during analysis, it is also important to be aware that this may disguise significant variations between individual ethnic groups.

Gender and gender identity

As with age, many HR systems contain fairly comprehensive and reliable staff data on gender. HEIs have legal obligations to monitor gender under the Sex Discrimination Act 1975 (as amended) (HM Government, 2008) and the Equality Act 2006 (HM Government, 2006).

HEIs should also consider whether and when to ask staff about their gender identity. Questions about gender identity should be asked separately from questions about gender or sexual orientation. ECU's publication *Experience of lesbian, gay, bisexual and trans staff and students in higher education: research report 2009* (ECU, 2009b) provides more information about when and how to monitor gender identity. By monitoring gender identity, HEIs will be able to learn more about, and better meet, the needs of their trans staff and students.

Religion or belief

As with age and sexual orientation, there is no specific legal requirement to monitor religion or belief; however, it is often important for HEIs to have access to workforce data on religion or belief to help inform policy- and decision-

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making. Such data will assist, for example, when planning the provision of catering services to meet the diverse requirements of staff, establishing spaces for prayer or contemplation, or selecting key religious holy days to include in an online calendar (recognising that levels of religious observance vary between individuals). Consulting religion and belief working groups (consisting of staff and students of different religion and belief, and none) and staff and students' unions can assist HEIs in designing a question that meets local needs. There may also be merit in referring to the question used in the Census or the annual British Social Attitudes survey, as using the same question enables comparisons to be made with population statistics, while bearing in mind that there is a very broad spectrum of religion and belief. Religion and belief is not static, and there may be merit in monitoring this regularly, and giving staff ample opportunity to disclose their religion or belief.

Sexual orientation

Asking staff for sexual orientation data can provide an important means of assessing whether lesbian, gay or bisexual staff members are at a potential disadvantage – for example, in relation to career progression, pay, etc. – compared with heterosexual staff. Monitoring sexual orientation can also help an HEI show the same level of commitment to lesbian, gay and bisexual (LGB) equality as it does to other equality issues, especially if the HEI is seen to respond to any issues that arise in a monitoring exercise.

As with other areas, such as disability and religion, ECU encourages HEIs to monitor sexual orientation if they have provided a safe environment in which to disclose, and are confident that they have robust and confidential mechanisms for recording the information. It is important to explain clearly to staff how information about their sexual orientation will be stored and used. HEIs may find they receive a higher response rate when asking staff to disclose their sexual orientation in the context of a confidential and anonymous staff survey, rather than on recruitment monitoring forms. However, HEIs are increasingly reporting growing response rates, and a very positive impact on their workplace culture, after seeking sexual orientation data from their staff.

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Other areas

HEIs often request information from staff in relation to other areas – such as marital/civil partnership status, or childcare and other caring responsibilities – and such questions can generate very useful data. Other information stored on HR systems – such as information about staff members' part-time or full-time status, fixed-term or permanent contract status, or early career researcher status – will also be useful as monitoring data to enable HEIs to explore whether patterns of potential disadvantage or discrimination may exist.

3 Considering how to encourage and enable staff disclosure

3.1 Creating a positive culture for staff to encourage disclosure

For any HEI committed to improving staff disclosure of equality data, it is important to recognise the need for an inclusive and supportive workplace culture. Taking visible steps to create a positive culture and promote awareness and understanding can make a significant contribution to an individual's decision to disclose. *Interventions for staff disclosure in higher education: background paper 2009* (ECU, 2009a) recommends steps that could be implemented by HEIs. These include:

- = fostering visible leadership; developing managers who understand the benefits of equality and diversity and have a proactive approach to achieving it
- = developing a workplace culture that is supportive and respects the individuality of all staff
- = providing equality and diversity learning opportunities for all staff
- = involving staff from equality areas in policy-making and other decision-making processes.

Box 1 provides an example of the strategy of an HEI that participated in ECU's disclosure project and worked to encourage an inclusive culture.

Box 1 University of Leeds: Progressing a culture change

As part of its work to improve disclosure, the university worked on raising disability awareness and introduced policies that are supportive of staff needs.

Leeds developed a booklet, *Building disability confidence – supporting disabled staff at the University of Leeds* (University of Leeds, 2009), detailing the support available to disabled staff, and distributed it to all staff

(www.equality.leeds.ac.uk/downloads/staff_leaflet/disabled-staff-leaflet.pdf).

A flexible working charter, which was launched at a staff benefits fair, demonstrates Leeds' commitment to the principles of flexible working. The university's equality service is currently delivering equality and diversity training to 1700 staff members, focusing on the need to take a flexible approach to the management of the diverse workforce. It is anticipated that this will benefit disabled and ethnic minority staff as well as the obvious target audience of staff with caring responsibilities.

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It should be acknowledged that for certain reasons – negative attitudes, higher risk of discrimination and general acceptance by society – staff may be more likely to disclose their equality status in some areas than others. Staff may be more inclined to disclose their age than their sexual orientation; an individual with multiple impairments may disclose a visible impairment, such as being a wheelchair-user, without disclosing an impairment relating to mental health.

Box 2 Mental health disclosure

During their involvement in ECU's disclosure project, Oxford Brookes University and University of Hull highlighted issues relating to mental health disclosure, such as the continuing stigma of being labelled with a mental health condition. Some staff commented that they were initially reluctant to disclose details of their mental health, but once they had formed a relationship of trust (such as with the staff disability adviser), they were more likely to have the confidence to disclose such information.

Oxford Brookes has developed detailed guidance on interviewing disabled applicants during recruitment. This involved input from the local Mencap group and was piloted in a training session for the learning resources senior management team.

High-profile events or initiatives that indicate significant buy-in from senior leaders and managers within an HEI are also crucial in making staff feel more confident about responding to disclosure questions.

Box 3 Oxford Brookes University: Love and Justice Month

Oxford Brookes University held a Love and Justice Month of equality events in February 2009, on the theme of diversity and human rights, to coincide with the annual Human Rights Film Festival.

Events included workshops for line managers on flexible working and work-life balance and on supporting an inclusive workplace; and a photography and poetry competition which elicited some interesting creative responses.

Widespread publicity, including distributing a brochure through the local paper and radio interviews, ensured greater awareness throughout the community and across the university. The Chancellor and Vice-Chancellor both took part in events, sending a strong message of support.

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An HEI's intranet can also provide an effective channel for promoting visible signs of what an HEI is doing to create an inclusive and supportive culture. This might include raising awareness of new staff support resources or forthcoming equality events. A higher profile of equality issues will often influence decisions on whether a staff member feels confident in disclosing. The University of Birmingham was one HEI that looked at the use of intranet during the ECU project (see section 5.5).

3.2 Creating practical opportunities for disclosure

When planning a strategy to increase disclosure, an important priority is to consider whether current policy and practice for collecting staff equality data will create any barriers that may have a negative impact on individual decisions to disclose. ECU has produced guidance on conducting equality impact assessments (ECU, 2007), which contains a tool that may be a useful mechanism to determine whether a policy results in differential treatment and/or has a negative impact on some staff groups.

Disclosure procedures should support ongoing opportunities for staff to disclose throughout their employment at the HEI. Some staff will withhold disclosure of particular information when first joining an institution. However, offering a range of disclosure opportunities may facilitate these staff to disclose at a later date, as well as enabling other staff to disclose changes in personal circumstances.

Opportunities that could be considered for capturing equality status information include:

- = job application
- = interview
- = medical screening (before and during employment)
- = induction
- = development and performance review
- = staff survey (including annual surveys, pulse surveys and equality monitoring surveys)
- = HR self-service system
- = promotion or progression to another role within the HEI
- = sickness absence interview
- = disability leave request

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- = request for flexible leave
- = request for reasonable adjustment or other form of workplace support, such as Access to Work
- = car parking permit requests (e.g. Blue Badge parking)
- = fire evacuation plans (to identify those who may require a personal emergency evacuation plan – the mobility impaired, pregnant women and older staff members)
- = exit interviews.

A demonstration of an employer's commitment to, and awareness of, equality issues in job vacancies, interviews and induction events will encourage disclosure at an early stage. This will obviously be of benefit in planning and anticipating any support needs that may arise.

Box 4 University of Birmingham: Staff induction programme

The University of Birmingham has reviewed its staff induction programme and devised a new one-day welcome session, which includes information on rights and responsibilities with regard to equality and diversity; guidance and signposting on support for disabled staff; and invitations to join the staff disability group and BME staff group.

The staff disability adviser attends the welcome session to talk about the importance of equality and diversity as an institutional value.

Invitations to the welcome session, which is held in an accessible venue, ask explicitly if staff need adjustments, and state arrangements for alternative tours of the campus where staff cannot undertake the walking tour. Feedback from the initial welcome session, held in April 2009, indicated an overall satisfaction score of 79 per cent.

Although ongoing opportunities for disclosure can be effective, it is important to find a balance between improving disclosure levels and not overwhelming staff with requests for information. Unless carefully managed, staff may become fatigued and lose interest in cooperating, which could lead to a drop in response rates.

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Technology can play a useful role in effective monitoring and supporting the needs of staff. As part of a disclosure strategy, HEIs should look at areas where they can introduce, or make better use of, information technology.

Human resources self-service systems

Self-service online systems are increasingly being used in HEIs' HR departments. These provide staff with a convenient way to access and update their personal details. Staff are able to disclose whenever they wish while keeping control of their personal equality data, confident that only selected staff in the HEI will have access to the data they disclose. With consent from staff, HR departments can use equality data to conduct workforce monitoring and plan how to support and accommodate diverse needs.

As opposed to a paper record, or a less secure IT system (such as an Excel spreadsheet), which could possibly be accessed by any member of staff, the security that a well designed HR self-service system can offer gives staff increased confidence to disclose. These systems can also benefit the HEI, as they can produce statistics on the diversity of the workforce and enable improved target-setting, workforce planning and monitoring of equality key performance indicators – which may be particularly useful considering the direction of future equality legislation.

Box 5 Aston University: Encouraging disclosure through IT

Aston University encouraged all staff to disclose their disability status through the completion of a new online monitoring form. Of those who have responded, 76 people have disclosed that they have a disability, an increase of 22 people on previous records. This means that the declaration rate for monitoring purposes has gone up from 3.6 to 5.5 per cent of the core workforce.

When considering or planning IT-based systems to capture disclosure information from staff, it is important to ensure these systems themselves are accessible. For example, when designing an online equality monitoring form to be used by job applicants, it is important to ensure the form can be completed by those who access the web using screen-reader software or other assistive technology. Otherwise, some of the most relevant staff may be unable to provide the information you seek. Further information for improving website and software accessibility is published by JISC Tech-Dis (2007).

Data protection and privacy issues

Collection of staff disclosure data is essential to ensure HEIs' compliance with HESA requirements and the various public sector duties placed on them by anti-discrimination legislation. At the same time, the Data Protection Act 1998 (HM Government, 1998b) requires HEIs to comply with a number of important principles regarding privacy and disclosure when handling personal data. These principles include ensuring such data are processed and used for limited purposes, and that the data are accurate and up-to-date. The Act also allows people to find out what personal information is held about them by making a subject access request. The Data Protection Act categorises certain types of data, including equality status data, as 'sensitive personal data', and subjects these to stricter conditions of processing.

The Human Rights Act 1998 (HM Government, 1998a) provides a right to privacy that, in practice, allows staff to refuse to disclose personal information. It is therefore important for HEIs to respect their duty of confidentiality and demonstrate to staff why equality data are being collected and how they will be used. If staff are confident of the benefits of disclosing, they will be more inclined to provide personal information, particularly where it may, for example, lead to better support arrangements.

3.3 Communicating the case for disclosure to staff

Effective communication is a critical element of encouraging staff disclosure. It is important for HEIs to spend time understanding why they are asking disclosure questions of staff, and pre-empting any concerns or questions staff may have about the information that is requested.

Whenever an HEI is considering revising or introducing a new method of seeking staff disclosure data, it is important that those delivering this work ask themselves the following questions.

- = How will we explain the purpose of these disclosure questions to staff, to ensure staff members understand how the data will be used?
- = How will we reassure staff about the way in which the data will be stored? In particular, how will we communicate any safeguards that exist to protect staff members' confidentiality and privacy?

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- = How will we make it clear to staff, when they are answering a disclosure question, whether the information they provide will be used solely for statistical monitoring purposes, or whether the information is likely to prompt some contact on an individual basis (e.g. a discussion with their manager about disability-related adjustments)? If some questions in a disclosure form will be used solely for statistical monitoring purposes and others might prompt contact from someone, how will we make this difference clear?
- = What communication work do we need to do to make those who have access to disclosure data (e.g. staff in HR departments) aware of how to handle such data appropriately and respect people's confidentiality?
- = What HEI-wide methods will we use to communicate the benefits of disclosure to all staff (e.g. publishing frequently asked questions about disclosure on the HEI's intranet, or publishing information about changes that have been made in response to disclosure data)?
- = Have we sought appropriate buy-in from staff (possibly via staff networks, such as a disabled staff network or an LGB staff network) and/or their representatives (e.g. trade unions) in relation to any changes we are proposing?

ECU recommends that HEIs take a considered but confident approach to issues of disclosure. HEIs are increasingly finding that any initial concerns about introducing new forms of disclosure (such as concerns about introducing sexual orientation or religion monitoring questions) can be managed effectively, provided there is a clear rationale for these changes, and effective communication is in place to explain this rationale to staff. It is also worth preparing for any come-back by thinking through, in advance, what comments might be received about any new disclosure initiative. HEIs may even predict criticisms that may come forward from staff and draft sample answers to them, as this can help make HEIs feel more confident about the work they are doing in this area.

Boxes 6 to 8 illustrate some innovative methods for promoting disclosure to staff.

Box 6 Oxford Brookes University: Promoting through payslips

Oxford Brookes University sent out a letter attached to January 2009 payslips encouraging all staff to review and revise their disclosed equality status data. Since February 2009, 31 per cent of staff have revised their data.

Box 7 Using websites

Aston University, the University of Birmingham and Canterbury Christ Church University are developing information for staff on disability disclosure and the support services that are available to publish online. Disabled staff at Oxford Brookes University have also proposed developing anonymised accounts of their experiences as a web-based resource for managers.

Box 8 University of Salford: Involvement of the staff disability network

In working to improve disclosure and create a more inclusive culture, the University of Salford has seen the importance of involving its Salford University Disabled Staff (SUDS) Network. SUDS has proved a very helpful bridge in communicating with the relevant staff, as have the other staff networks.

3.4 Drafting disclosure questions

While reviewing existing policies and practices, it is possible that HEIs will identify issues in relation to the use of language within the disclosure questions. Knowing the best way in which to frame disclosure questions, and defining equality terms such as 'disability', can be difficult. It is important to spend some time considering these issues, as the way in which a question is asked can have a significant effect on the number of staff choosing to disclose. This section should be read in conjunction with section 2.2, which highlights some key issues relating to individual equality strands.

It is important that disclosure questions are written using inclusive language. Questions should be easy to understand and designed to facilitate the capture of data that indicate where staff may be disadvantaged by barriers they may encounter while working in the HEI. For example, if an individual is assured that they are being asked for information about their disability status because the HEI wants to build an inclusive environment for disabled staff and put adjustments in place to deliver equality for disabled and non-disabled staff, they may be more likely to disclose than if the question appears to ask for information about disability status with no indication of how the information will be used. Some useful suggestions on framing questions are included in the publication *Do you have a disability – yes or no? Or is there a better way of asking?* (Rose, 2006).

Considering how to encourage and enable staff disclosure

Consistent use of inclusive language across the institution should also be encouraged. Equality terminology is continually evolving, and it is important to ensure such developments are monitored. ECU, the Association of University Administrators (AUA) and the Higher Education Equal Opportunities Network (HEEON) have produced an A–Z Guide (ECU, AUA and HEEON, 2008), which may be useful to consult when designing questions.

A well devised equality questionnaire should look for staff to disclose their equality status, but should also have supplementary questions that show that the HEI is committed to supporting all staff. Such questions could be framed as:

- = Do you wish to discuss your access requirements with an appropriate member of staff?
- = Would you like to receive information on a particular staff network?
- = Would you like to receive further information on equality events?
- = Do you consider yourself to have been discriminated against while at work?
- = Would you be interested in participating in a positive action development programme?

During their participation in the ECU project, Aston University and University of Hull developed new staff survey forms (see www.ecu.ac.uk/inclusive-practice/staff-disclosure-of-equality-data).

3.5 Developing an institution-wide action plan on staff disclosure

ECU recommends that HEIs consider adopting an action plan approach to disclosure. An action plan provides a structure for developing and working on interventions that will improve disclosure and build a supportive and inclusive culture that is welcoming for all staff.

HEIs will already have action plans in place to support delivery of the public sector equality duties, which may incorporate actions on improving equality disclosure. Alternatively, and/or in addition, HEIs may wish to consider developing a separate disclosure action plan. A template is included in Appendix B for HEIs to formulate an action plan.

Considering how to encourage and enable staff disclosure

When planning an action plan on disclosure for your HEI, it is important to include:

- = aims – the problems, and where the priorities lie
- = a description of the interventions to be implemented
- = specific outcomes that the HEI wishes to achieve to improve levels of (and create a more supportive culture for) disclosure set out against a realistic timetable
- = measurable indicators of progress towards those outcomes
- = lines of accountability – who will be responsible for implementing interventions.

In completing the action plan, ECU advises HEIs to refer to *Interventions for staff disclosure in higher education: background paper 2009* (ECU, 2009a) for ideas on what interventions to include.

There are different ways in which progress on staff disclosure issues can be observed or measured. Obviously an increase in disclosure rates will be one of the key indicators of progress. Due to the short time frame available during the ECU project, it was not possible to measure any significant impact on disclosure rates at the participating HEIs.

The HEIs were, however, encouraged to develop a range of other indicators to measure progress on the delivery of their action plans in the short, mid- and long term. Examples of these include:

- = revision of new equality monitoring forms
- = delivery of equality workshops for selected staff, such as in HR
- = feedback from training (immediately following training, and then at a later date to determine if training has led to an increase in inclusive behaviour)
- = development of a new web page on the benefits of disclosure
- = increased opportunities for disclosure
- = new guidance on supporting disabled staff
- = increased number of disabled staff applying, shortlisted and appointed for employment
- = increased number of reasonable adjustment requests and referrals to Access to Work
- = development of an electronic database for managing workplace adjustments
- = more staff reviewing their equality data via HR self-service systems.

3.6 Sustainability of approach

An inclusive culture and improved disclosure rates cannot be achieved in the short term; HEIs will need to commit to sustaining work on these issues, and continue to monitor and improve the situation with regard to staff disclosure.

As can be seen in section 5, with the limited time and resources available, the HEIs participating in the ECU project have highlighted a number of actions that they will look to deliver in the longer term, for example, further work to improve disclosure of sexual orientation.

Box 9 Sheffield Hallam University: Supporting lesbian, gay, bisexual and trans (LGBT) staff

Sheffield Hallam University is committed to developing a supportive and inclusive culture for LGBT staff. Part of the rationale for their participation in the ECU project was to develop strategies for exploring the views of the institution's LGBT community.

Sheffield Hallam plans to explore appropriate means of reviewing the experiences of staff from LGBT groups, and to develop the institution's employee opinion survey to collect diversity monitoring data.

To sustain this work further, collaboration is planned with the LGBT staff forum and other key stakeholders to explore themes for further research and effective means of engaging with LGBT groups.

4 Planning how to use the data collected

4.1 Using data to inform policy- and decision-making and target your equality work

Staff disclosure data will be extremely valuable in providing an HEI with a detailed picture of equality issues within the organisation, and also in enabling positive action interventions and projects to be properly targeted.

At the most basic level, an HEI can use staff disclosure data to understand the composition of its workforce and thereby, for example:

- = explore areas of under-representation of specific groups of people at particular levels or in particular roles within the organisation
- = assess the potential demand for inclusive services, such as catering services for different religious groups, spaces for prayer or contemplation, or the potential demand for an LGBT staff forum
- = identify which key religious festivals would be most relevant to include in an online calendar.

Staff disclosure data become even more useful to an HEI when they are cross-referenced with other information in order to provide greater understanding of the experience of different staff groups. For example, an HEI can cross-refer disclosure data with:

- = information about salary, overtime take-up rates, performance-related pay schemes, etc., to inform a thorough equal pay audit
- = information about promotion and progression rates to explore whether potential barriers to promotion exist for particular groups of staff
- = information about a proposed restructuring to explore whether the proposals are likely to have a disproportionate impact on any specific equalities groups
- = other responses within a staff survey, to assess whether particular groups of staff are more or less likely to report bullying or harassment, receive the training they feel they require, etc.

Staff disclosure data are also a very important ingredient for effective equality impact assessment work. If an HEI is proposing a new policy or procedure, or a major management decision, then staff disclosure data will often be essential

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to enable a proper analysis to be made as to whether the proposed changes are likely to have a disproportionate impact on any specific equality group. For further information see ECU's equality impact assessment guidance (ECU, 2007).

Box 10 University of Birmingham: Review of policies, processes and procedures for disability disclosure

The University of Birmingham conducted a review of processes for disclosing a disability. This indicated that multiple opportunities were available formally to disclose disability status so that it would be entered on an individual's personal record.

However, the review indicated that once a disability had been formally disclosed no standard practice was in place as to how this information would be used and what support staff could expect to receive. As a result, staff expectations of support following disclosure were not always being met. The review also found that the language used to define what was meant by 'disability' focused on the medical model of disability.

As a result of this review, the following actions have been taken.

- = A self-service personal records system is currently under development, which will enable staff directly to update their personal details, including their disability status. In consultation with the university's staff disability group, a new definition of disability has been developed and will be used. This will include the social model definition of disability alongside the Disability Discrimination Act's definition.
- = In conjunction with the staff disability group, it has also been agreed that when a disability is formally disclosed, this information will be shared by the university with certain 'key staff', to ensure disclosure results in appropriate workplace support. The key staff are still to be defined, but would include the staff disability adviser, which is a new post from September 2009.
- = Once this process has been finalised, a policy on disability disclosure will also be developed.

Box 11 Aston University: Benefits of working on disclosure

Aston University has found that working actively to increase disclosure has greatly improved general awareness of the support available for disabled staff. The project has presented an opportunity for disabled people, or those with medical conditions, to come and talk through the issues that concern them, including whether disclosure is appropriate and safe for them. The project has provided a platform on which Aston will be able to build better awareness of what the university, as an employer, can offer staff.

4.2 Using data to prompt discussions about adjustments and support for individual staff members

Planning and responding to requests for adjustments and support is one purpose of encouraging disclosure, as an HEI may wish to use disclosure data to target particular staff groups with information about specific sources of support. Disclosure data might, for example, enable an HEI to send out targeted information about a positive-action training event for women, or information about a disabled staff network to particular groups of staff.

If an HEI is planning to use disclosure data to contact individuals in this way, it is essential, for data protection reasons and to ensure transparency, to consider whether or not staff members consented to their information being used in this way when the data were collected. Just because a staff member disclosed their religion or sexual orientation on a monitoring form, for example, this does not necessarily mean they have consented to receiving letters or emails about specific support networks or events linked to religion or sexual orientation.

Sometimes it can be useful for an HEI to ask staff a separate question to identify staff who would be interested in receiving such information. Including a section along the following lines in a monitoring form might be worth considering for these purposes.

Planning how to use the data collected

The questions on our monitoring form will be used only for statistical purposes, to help us to check the effectiveness of our equality and diversity policies. We will treat this information sensitively and in a way that does not identify you personally. Your answers to the above questions will not prompt any contact from HR or other departments.

However, if you are interested in receiving information in future about any events or initiatives for staff that relate to any of the equality areas listed below, please tick the relevant box:

- Age*
- Disability*
- Ethnicity*
- Gender*
- Religion and belief*
- Sexual orientation*

If you are a disabled member of staff and would like HR to contact you for a confidential discussion about any disability-related adjustments you might require at work, please tick the box below:

- I am a disabled member of staff and would like HR to contact me to discuss the support that I might require.*

The above wording is a draft, and would need to be adapted to suit the context of an individual HEI. However, this general approach – which makes clear to staff what kind of contact they are likely to receive after they answer disclosure questions – can make people feel much more confident about providing answers.

One area in which HEIs frequently use disclosure data to contact individual members of staff relates to disability-related support. During their involvement in the ECU project, Canterbury Christ Church University took a particular interest in creating a central budget and a database to record and support adjustments in the workplace for disabled staff.

Box 12 Canterbury Christ Church University: Managing and funding adjustments

Canterbury Christ Church was keen to introduce a centralised approach that would support all disabled staff consistently, while ensuring no department or faculty would be disadvantaged, financially or otherwise, in meeting disability equality responsibilities.

The university significantly improved its disability disclosure rates through a data validation exercise, in which the question about 'disability' was phrased in a much more open way than had previously been used in equal opportunities monitoring and staff record forms.

The principles of the centralised approach are:

- = workplace assessments are undertaken by trained staff (mainly in HR) who either provide direct advice or make use of additional support services such as occupational health, a detailed workplace assessment by a qualified physiotherapist, advice from an internal assistive technology specialist, or referral to Access to Work
- = the cost of workplace adjustments (beyond those that should be provided by the department) are financed from a central budget, with reclaim of costs from Access to Work where appropriate
- = all adjustments are recorded on a database to track activity and provide a record of equipment and resources.

The central budget and database for workplace adjustments has had the following benefits:

- = the response to the need for workplace adjustments is appropriate, timely and more consistent across the institution
- = there is a flexible approach to dealing with a wide range of workplace health and disability issues, both temporary and longer-term
- = the design of the database will allow it to function as a pool of information about various types of adjustment
- = staff can share experiences and 'test' possible adjustment options before committing to new equipment and/or training
- = frequent low-cost adjustments (e.g. wireless mice, ergonomic keyboards) can be approved without formal assessment
- = the database encourages sharing of knowledge and good practice.

continued

Planning how to use the data collected

Box 12 continued

- = designing an appropriate database has been a matter of trial and error, and has been time-consuming
 - = obtaining approval for the idea of a centralised budget was challenging, as no data existed to help to predict the level of financial support required; at present this is being reviewed
 - = implementing the new system has implications for the workload of staff in HR.
- Following recent interventions, the information provided to disabled staff is being rewritten and will be promoted via the website and printed brochures.

Access to Work

Access to Work (www.direct.gov.uk/en/DisabledPeople/EmploymentSupport/WorkSchemesAndProgrammes/DG_4000347) is a government scheme managed through Jobcentre Plus. It provides practical, individually tailored advice and support to disabled people who are in, or seeking, work. In some cases, Access to Work will provide full funding for adjustments that a staff member may require; in others the employer may be expected to contribute towards the costs.

One reason to encourage disclosure of disability status from staff members as early as possible is to ensure staff members obtain as much support as possible from Access to Work. It is generally a good idea for a disabled staff member to make their first Access to Work application within the first six weeks after starting work at a particular HEI, as in these circumstances Access to Work will be more likely to cover up to 100 per cent of the approved costs of the required adjustments.

For a disabled member of staff, Access to Work funding may be available in relation to paying costs towards:

- = providing equipment that may be needed while at work
- = adapting premises
- = providing a support worker
- = getting to work (if the individual is unable to use public transport)
- = meeting costs for communication at job interviews.

Box 13 University of Birmingham: Access to Work guidance

The University of Birmingham has developed guidance on how to get support from Access to Work (www.equality.bham.ac.uk/policy/Policies/Access_to_work_guidelines_April_2009_.pdf).

This was produced in conjunction with the Department for Work and Pensions' Access to Work team and the HEI's staff disability group. Consideration of reasonable adjustments has also been taken across into other policies and guidance, such as on recruitment and selection, absence management (for example, absence as a possible indicator that adjustments are needed), and staff performance reviews (e.g. underperformance as a possible indicator). The aim is to make consideration of disability and reasonable adjustments part of 'business as usual' when managing staff.

Accurate, up-to-date staff disclosure data can also be important in enabling HEIs to meet health and safety requirements, for example by identifying staff who may require a personal emergency evacuation plan.

4.3 Using the heidi equality online tool to benchmark performance

heidi (www.heidi.ac.uk) is a data management tool that enables HEIs to access a broad range of data about their own workforces and student bodies and to compare these results with those of other institutions. HEIs need to subscribe to heidi in order to use it, and most already do subscribe to the service.

ECU and HESA have added a new equality function, heidi equality, to the existing database. heidi equality includes student, staff and destination data for years 2006/07 and 2007/08. As we move forward, data from future years will be added into heidi equality. This information comes from the statistical returns that HEIs make to HESA each year. Data can be disaggregated by disability, ethnicity, gender and age. heidi equality allows users to collate relevant equality data and produce tables and charts that benchmark the performance of one HEI against others, or against the whole higher education sector.

Although heidi equality is owned and managed by HESA, ECU has produced a briefing (www.ecu.ac.uk/publications/introducing-heidi-equality) to highlight how equality and diversity practitioners and other staff in HEIs can use this tool to provide an evidence base for equality work.

5 HEI case studies

Between September 2008 and June 2009, eight HEIs piloted a range of interventions from ECU's *Interventions for staff disclosure in higher education: background paper 2009* (ECU, 2009a). This section looks at each HEI and gives details on:

- = staff involved in implementing interventions
- = rationale for participation in the project
- = key aims and objectives
- = interventions implemented
- = progress made on each intervention
- = benefits and challenges identified in implementing the interventions
- = future actions planned to improve disclosure.

5.1 Aston University

Staff roles involved in the project:

- = equality and diversity adviser
- = members of equality and diversity forum
- = joint unions consultative committee
- = HR systems manager
- = disability coordinator
- = fire officer
- = University and College Union equality representative.

Rationale for participation in the project:

- = to improve the disclosure rate for disabled members of staff
- = to increase opportunities to gather more robust qualitative monitoring data
- = to be able to tailor support more appropriately, and with greater sensitivity, to the needs of disabled staff.

Key aims and objectives:

- = improve clarity for staff about disclosure
- = improve the quality of data

- = raise management awareness of employment issues relating to disability
- = raise awareness of benefits of disclosure for disabled staff
- = further develop supportive structures for disabled employees
- = improve communication about supportive measures.

Interventions implemented:

The focus to date has been on trying to improve the disclosure rate by giving better information about what is involved, and providing ongoing opportunities for people to disclose through the completion of an online monitoring form.

Staff have been offered the opportunity to:

- = submit their monitoring data
- = disclose their disability status to the university
- = make an appointment with the equality and diversity adviser
- = have a personal plan for emergency evacuation of the building
- = join a disability network.

Progress made on each intervention:

Aston sent out two emails to all staff and subsequently wrote personally to all those who had not replied. In addition to the increase in staff disclosure (see Box 5), the staff survey has found:

- = three members of staff who need personal emergency evacuation plans
- = seven people who have asked to come and discuss their circumstances with the equality and diversity adviser
- = nine people who wish formally to disclose their disability to the university
- = six people who would like to be part of a face-to-face disability network
- = ten people who would like to join an online forum.

Benefits and challenges identified in implementing the interventions:

Benefits:

- = clear improvement in the awareness of disabled staff within the university
- = opportunities for disabled people to come and talk through the issues raised for them, or to talk about whether disclosure is appropriate and safe for them

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- = a platform on which the university can build better awareness of what it, as an employer, can offer staff.

Challenges:

- = the limited time available in the project did not provide an opportunity for the university fully to implement its action plan; however, the work being conducted by the university will be sustained into 2010 and beyond
- = complex definitions of disability, which Aston will need to consider carefully when deciding how much information should be communicated to staff to ensure that all information is clear and transparent, yet not overwhelming
- = technical issues with the recently introduced HR system that have had an impact on the deadline for getting the facility fully operational; a new format website has recently been introduced, which will hopefully give more scope for displaying and promoting relevant information
- = staff fatigue with questionnaires, and how to ensure all members of staff are supported in responding and that any issues raised are dealt with appropriately.

Future actions planned to improve disclosure:

- = development and launch of a blackboard site for the online disability forum
- = wide promotion of the relaunched face-to-face staff network
- = distribution of printed surveys to all those excluded from the online questionnaire
- = revision of leaflets about the support available for disabled members of staff
- = arrangement of ongoing meetings with some disabled members of staff.

5.2 University of Birmingham

Staff roles involved in the project:

- = diversity adviser (staff)
- = HR project manager – implementing revisions to disability definitions
- = staff development consultant – review of induction content.

Rationale for participation in the project:

The university has a high disclosure rate, with 96.9 per cent of staff disclosing their disability status, 100 per cent their gender, and 99.1 per cent their ethnic

origin. However, it was acknowledged that the percentage of staff disclosing an actual disability was low at 2.2 per cent. This was not considered to be a true representation of the proportion of disabled staff, so the university was interested in ways of improving disclosure.

Key aims and objectives:

To create a workplace culture that encourages and supports the disclosure of disability, in which disabled staff receive appropriate support and so can develop their full potential.

Interventions implemented:

- = review and revision of policies, processes and procedures for disclosure
- = development of staff monitoring forms that encourage disclosure
- = use of staff internet sites to provide information on disability disclosure and support available
- = development of equality-related literature in induction materials and an equality module in induction courses
- = development and promotion of guidance on providing anticipatory and reasonable adjustments
- = introduction and encouragement of appropriate mechanisms to ensure the voices of disabled staff are involved, heard and supported.

Progress made on each intervention:

- = review of processes for disclosing a disability
- = development of the internet site once the guidance on disclosure and how information will be used is finalised
- = creation of a one-day welcome session following review of the staff induction programme – this includes information on rights and responsibilities with regard to equality and diversity, guidance and signposting on support for disabled staff, and invitations to join the staff disability group and BME staff group; invitations to the session explicitly ask if staff need adjustments and state arrangements for alternative tours of the campus where staff cannot undertake the walking tour – feedback from the initial session indicated an overall satisfaction score of 79 per cent

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- = guidance on Access to Work
- = consultation with the university staff disability group on the development of initiatives under this project.

Benefits and challenges identified in implementing the interventions:

Benefits:

There has been an increase in the proportion of staff systems and processes that have had the involvement and approval of disabled staff.

Challenges:

The university was fortunate that the ECU project coincided with several other projects – such as the introduction of the staff self-service personal records system and the review of induction – that supported the interventions we wanted to introduce. It may have been harder to introduce interventions if they had not coincided with broader review cycles.

Future actions planned to improve disclosure:

As noted in Box 10, a policy is being developed on staff disability disclosure that will address issues such as why staff should disclose, and how their information will be used.

5.3 Canterbury Christ Church University

Staff roles involved in the project:

- = Pro Vice-Chancellor with responsibility for Equality and Diversity
- = equality and diversity manager
- = assistant director of human resources
- = human resources officer (employee relations)
- = computing liaison officer with specific knowledge of assistive technology.

Rationale for participation in the project:

- = to learn about what other HEIs were doing and the difficulties they had encountered in improving disclosure
- = to benefit from the interaction facilitated by ECU

- = to have an external spur to guarantee the momentum of the implemented interventions.

Key aims and objectives:

- = improve support for and engagement with disabled staff at the university
- = improve the disclosure of disability at the university
- = learn about the experience of other HEIs and use this in informing the university's own interventions.

Interventions implemented:

- = creation of a central budget for workplace adjustments
- = development of a database to record and monitor workplace adjustments – the design of the database will allow it to function as a pool of information about various types of adjustment
- = communication of information about the new arrangements to all heads of departments and managers, and all staff
- = trial of a more openly phrased question about disability in the staff survey compared with that on equal opportunities or staff record forms.

Progress made on each intervention:

All the interventions listed have now been undertaken.

Benefits and challenges identified in implementing the interventions:

Benefits:

- = staff and managers know where to go for information and support
- = the university's response to the need for workplace adjustments is appropriate, timely and consistent across the institution
- = frequent low-cost adjustments (e.g. wireless mice, ergonomic keyboards and so on) can be approved without formal assessment
- = the database allows tracking of what has been provided
- = the database encourages sharing of knowledge and good practice.

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Challenges:

- = designing an appropriate database has been a matter of trial and error, and has been time-consuming
- = establishing an initial budget was challenging, as the university did not have data to predict how much would be required
- = implementing the new system has increased the workload of staff in HR.

Future actions planned to improve disclosure:

- = promotion of rewritten information for disabled staff via the website and printed brochures
- = assignment of a named contact for disabled staff in the HR department.

5.4 University of Hull

Staff roles involved in the project:

- = staff disability adviser
- = marketing department and occupational health staff
- = HR managers and advisers
- = facilities directorate, students' union and faculty of health and social care
- = diversity adviser.

Rationale for participation in the project:

- = to improve the quality and clarity of data relating to disabled staff
- = to raise awareness of disability, encouraging disclosure
- = to provide support to disabled staff where needed.

Key aims and objectives:

- = develop staff monitoring forms that encourage disclosure of disability in order to improve clarity and quality of data
- = continue to offer disabled people the opportunity to gain some work experience at the university
- = explore feasibility of financing reasonable adjustments centrally so that no section, department or faculty is disadvantaged financially or otherwise in meeting disability equality objectives.

Interventions implemented:

A monitoring form and questionnaire have been distributed to all staff.

Progress made on each intervention:

- = the university is currently in the process of data collection and making adjustments to the HR database with regard to the reporting of disability status; this work is yet to be completed
- = there has been some resistance towards the other two objectives, which could be due to the current economic downturn.

Benefits and challenges identified in implementing the interventions:

Benefits:

- = raised awareness and understanding of disability leading to an increase in disclosure – the number of staff who have disclosed their disability status is now 165, 6.8 per cent of the total number of staff; some staff who have disclosed subsequently requested additional support or adjustments
- = a number of staff who had not considered themselves disabled or needing any type of support were happy to register their impairment(s) against the HESA codes, which may indicate that there are fewer negative connotations and less stigma associated with disability than in previous years.

Challenges:

- = some reluctance by staff to disclose mental health problems, which indicates that there is still a stigma with mental health
- = some questionnaires have been returned with no name or mixed messages, in which case the data cannot be used.

Future actions planned to improve disclosure:

Disclosure questionnaires will be given to new members of staff and information will be provided via the occupational health/staff disability service. Positive attitudes towards disabled people will be promoted, and disability-related training, information and advice will be provided.

5.5 University of Leeds

Staff roles involved in the project:

- = equality and diversity manager
- = HR project manager
- = disability adviser in the student disability team, who has subsequently taken on the role of staff disability adviser.

Rationale for participation in the project:

- = to explore gaps in data that were identified through recent work
- = to provide benefit to the project from ongoing ideas on how to improve disclosure.

Key aims and objectives:

To disseminate any useful lessons, or any useful ideas and initiatives, to help other HEIs that might benefit.

Interventions implemented:

- = development of a booklet, *Building disability confidence – supporting disabled staff at the University of Leeds*, which has been distributed to all staff
- = review and revision of the university's recruitment documentation to ensure statements inviting prospective employees to disclose a disability are appropriately supportive, and adding an invitation to prospective applicants to contact HR in confidence to discuss any access requirements they might have for the interview process, or any adjustments they might need if their application is successful
- = a move towards 'employee self-service' – certain aspects of a member of staff's personal data on the HR and payroll systems can be amended by staff, which will encourage them to review their monitoring data, complete any gaps, and amend their declaration if appropriate
- = development of a disability disclosure process for staff if their circumstances alter, linked to a procedure for requesting reasonable adjustments – one of which could be requests for disability leave (which is categorised separately from annual or sick leave)

- = launch of a flexible working charter demonstrating the university's commitment to the principles of flexible working, with associated training for managers on the benefits.

Progress made on each intervention:

- = distribution of the *Building disability confidence* booklet to all current staff; new staff are advised of its existence with their letter of appointment
- = amendment of the application form and supporting information as described
- = pilot work on employee self-service has been delayed, so it has not been possible to monitor any impact on disclosure
- = a disability disclosure procedure, reasonable adjustments request form, and disability leave policy are in draft and currently under consultation with the campus unions; initial responses have been positive
- = launch of a flexible working statement, with a supporting statement from the Vice-Chancellor, at a recent staff benefits fair, which is being widely publicised across the university
- = the equality service is currently delivering equality and diversity training to 1700 staff members, focusing on the need to take a flexible approach to the management of the diverse workforce; it is anticipated that this will benefit disabled and ethnic minority staff as well as the obvious target audience of staff with caring responsibilities.

Benefits and challenges identified in implementing the interventions:

Benefits:

All the interventions have formed part of a strategy to develop and distribute practical support and guidance for managers and staff on equality and diversity issues across the whole spectrum. This has helped to raise the profile of the service and to raise awareness of equality and diversity issues generally.

Challenges:

The major challenge has been to progress some of the initiatives in the time scale for the project, some of which has been outside of the control of the equality service.

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Future actions planned to improve disclosure:

- = continuation of work on disability disclosure and associated documents through the consultation process until they are formally adopted by the university, after which they will be widely publicised
- = continuation of the employee self-service facility – the equality service will continue to work with HR to ensure equality data are reviewed and revised to reduce the gaps in the data as far as possible
- = as part of the work to develop a single equality scheme, the university has held focus groups with staff from all equality strands, and consideration will be given to the establishment of strand-related staff forums which may improve the confidence of staff to disclose their ethnicity, sexual orientation or disability.

5.6 Oxford Brookes University

Staff roles involved in the project:

- = equal opportunity and diversity coordinator
- = staff disability adviser
- = HR team
- = business partnership manager (equal opportunity and diversity)

Rationale for participation in the project:

- = to address the under-representation of disabled staff at the institution
- = to start monitoring for sexual orientation and religion and belief
- = to act on the institution's core value of increased diversity
- = to share learning with colleagues in the sector about what works and what does not.

Key aims and objectives:

- = increase disclosure for monitoring
- = improve data quality by introducing new HESA categories
- = promote equality in recruitment
- = increase staff understanding of diversity and promote a supportive culture.

Interventions implemented:

- = revision of the equal opportunities monitoring form used in recruitment and selection
- = revision of online and paper monitoring forms
- = letter sent to all staff to prompt them to complete online or paper versions
- = revision of recruitment and selection documentation and procedures
- = implementation of actions arising from equality impact assessments of recruitment and selection within directorates
- = revision of current recruitment and selection training
- = set up of a staff disability network
- = introduction of monitoring of requests for flexible working
- = introduction of a Love and Justice Month of equality events in February 2009, on the theme of equal rights, to coincide with annual Human Rights Film Festival.

Progress made on each intervention:

- = new monitoring form introduced
- = letter was sent out attached to January 2009 payslips encouraging all staff to review and revise their disclosed equality status data; 31 per cent of staff have revised their data since February 2009
- = actions arising from equality impact assessments of recruitment and selection have been implemented, although it may be too early to measure the effect
- = increased ownership of diversity issues in directorates – wording of new job descriptions and person specifications has been improved to ensure they are non-discriminatory and based more closely on the requirements of the role
- = detailed guidance on interviewing disabled applicants drawn up, with input from the local Mencap group, and piloted in a training session for the learning resources management team
- = first meeting of the staff disability network held in April; shared mailing list set up to help facilitate communication, and 28 disabled members of staff have now expressed an interest in joining the network
- = disabled staff have been involved, through a questionnaire, on the proposed revised parking policy

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- = disabled staff have proposed developing anonymised accounts of their experiences as a web-based resource for managers
- = Love and Justice month organised and well received (see Box 3).

Benefits and challenges identified in implementing the interventions:

Benefits:

- = procedures are now in place to collect the revised data required by the university, but further action is still needed to encourage more staff to update their data
- = guidance on interviewing disabled staff has been developed and incorporated in training – initial feedback is that it is useful
- = disabled staff network elicited a very positive response – to maintain the momentum of this group, Oxford Brookes will need to develop an electronic means of communication as it is very difficult to find a suitable time and place for all to meet face-to-face
- = Love and Justice Month was the first time the university had tried to run a programme of events on a scale of that size, and enabled the university to learn a lot about large-scale planning of accessible events.

Challenges:

- = Increasing staff disclosure rates and understanding data continues to be a complicated area. For example, in January 2009 the university had 3.5 per cent of staff with a disclosed disability (4.0 per cent of support staff, 3.2 per cent of academic staff; zero management). This overall figure was a dramatic increase from 2.8 per cent in December 2008. This represents an increase from 62 staff to 78. The reasons for this sudden increase are unclear, and it is not known whether this rate will be sustained.
- = The staff disability adviser finds that partial disclosure is common. Frequently the initial disclosure is of a visible physical impairment, and when a relationship of trust has been developed, further mental health issues are disclosed.

Future actions planned to improve disclosure:

- = use of sexual orientation and religion and belief data in future diversity reports to help reassure staff about how these sensitive data are used

- = affiliation with DisabledGo (www.disabledgo.com), which will host access information and job advertisements on its website to encourage more applications from disabled people
- = publicity about Texthelp assistive software, which can be installed on staff PCs at no additional charge
- = liaison with students to promote a supportive culture on LGBT issues; the university has been working with one very proactive student, who has recommended books for the library, requested library displays to support Oxford Pride, and developed suggested web pages giving local and national links.

5.7 University of Salford

Staff roles involved in the project:

- = HR projects manager
- = senior assistant registrar equality and diversity
- = Salford University Disabled Staff (SUDS) Network.

Rationale for participation in the project:

The university has been aware of low levels of declaration of disability among disabled employees, and similarly among other equality groups.

Key aims and objectives:

- = to find ways of encouraging employees to declare their personal equality-related data so the institution can monitor progress, or the lack of it
- = to identify better the impact of policies and practices on staff.

Interventions implemented:

The university has utilised the annual staff data check to encourage employees to declare if they have a disability and/or to tick a box and provide contact details for an informal discussion, if they wish.

Progress made on each intervention:

A considerable number of employees have provided their contact details and requested an informal discussion on disability. At the time of writing, it is not known if more employees have taken the opportunity to declare a disability. More

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declaration will provide a more accurate picture of the percentage of disabled staff the university employs, and help in planning and undertaking action to improve on this.

Benefits and challenges identified in implementing the interventions:

Benefits:

- = more employees than before have engaged in this issue at the university
- = more employees will either receive support in the workplace in relation to their disability, or will have peace of mind that support would be available if needed
- = SUDS has proved a very helpful bridge in communicating with relevant staff, as have the other staff networks.

Future actions planned to improve disclosure:

The university will implement its single equality scheme and e-recruitment. It will monitor the impact of these activities and positive outcomes on its equality and diversity agenda.

5.8 Sheffield Hallam University

Staff roles involved in the project:

- = widening participation policy unit relationship manager
- = diversity manager
- = diversity, ethics and widening participation coordinator, Faculty of Arts, Computing, Engineering and Sciences.

Rationale for participation in the project:

- = to facilitate review and development of the approach to staff declaration and disclosure of disability
- = to develop strategies for exploring the views of the university's LGBT community.

Key aims and objectives:

- = further develop the principles, policies and procedures for staff disclosure of disability and the provision of reasonable adjustments, and promote these effectively to staff groups

- = inform improvements in the collection and use of management information relating to staff disclosure of disability
- = explore appropriate means of reviewing the experiences of staff from LGBT groups.

Interventions implemented:

- = a major emphasis of the project has been on exploring the university's current approach to staff disclosure of disability and the provision of reasonable adjustments, which has resulted in a series of recommendations for future improvements to both the practices and provision of information and support to staff members
- = developments in the employee opinion survey have enabled the collection of diversity monitoring data, which facilitates the exploration of the views of LGBT staff groups.

Progress made on each intervention:

- = a report has been produced for the equality and diversity strategy group, containing recommendations for further development of the university's approach to staff disclosure of disability and the provision of reasonable adjustments, and it is hoped that this will encourage a greater proportion of disabled staff to disclose a disability, where it is in their best interests to do so
- = some analysis of the employee opinion survey has been initiated, and further consultation with the LGBT staff forum is likely to identify key themes for more detailed research.

Benefits and challenges identified in implementing the interventions:

Benefits:

- = identification of some of the key issues that were hindering disclosure
- = opportunity to establish a steering group to address these issues, and develop tools and guidance to support and facilitate disclosure.

Challenges:

- = ensuring a shared approach was taken to addressing an issue for which responsibility should be shared across the institution
- = ensuring disabled staff members felt empowered to share confidential information about their experiences.

Future actions planned to improve disclosure:

- = implementation of recommendations from the report on staff disclosure of disability and the provision of reasonable adjustments, in order to improve the quality of the disabled staff experience
- = further collaboration with the LGBT staff forum and other key stakeholders to explore themes for further research, and effective means of engaging with LGBT groups.

Appendix A: Checklist for HEIs when devising an action plan on staff disclosure

The checklist below lists the key points to consider in advance and during development of the disclosure action plan, and provides signposting to particular parts of this guide that may be useful to refer to for further reading.

Point to consider	Section in this guidance
What senior-level commitment is there to reviewing and improving the HEI's mechanisms for capturing and using staff equality data?	3.1
Which equality strands have a particularly high 'no return/unknown' rate, and what can the HEI learn from any marked differences in return rates between equality categories?	2.2 4
How easy is it for staff to update their personal records if their decision to disclose or their circumstances change, and how might the HEI make this easier for staff?	3.1 3.2
What is the HEI's understanding of (a) its reasons for collecting staff equality data and (b) how this information will be used?	2 4
How will the HEI ensure staff understand why equality data about them is being collected?	3.4
What new methods will the HEI adopt to communicate to staff the benefits of disclosing equality data?	3.3
How appropriate are the disclosure questions currently being asked of staff in terms of how they are worded?	3.4
How robust and confidential are the HEI's procedures for storing and managing equality data?	3.2
What strategies does the HEI have in place to make the best use of its staff disclosure data to (a) inform its equality and diversity work, (b) target individual equality and diversity interventions, and (c) benchmark the performance of the HEI?	4.1 3.5 4.3

Appendix B: Action plan template

Similar in principle to those produced for supporting delivery of the public sector duties for race, disability and gender, a disclosure action plan can be a useful tool in prioritising the key steps the institution will take to achieve higher rates of disclosure. Please refer to section 3.5 for further information.

There are six elements to the template, covering:

- = **equality group** – the group of staff the intervention is aimed at supporting
 - disabled staff, BME staff, LGBT staff, and so on
- = **intervention objective** – what the university hopes to achieve by introducing the intervention
- = **actions** – what the HEI will do to achieve the intervention objective
- = **by when** – the key dates by which the actions will be implemented
- = **responsibility** – who within the HEI will be the lead for implementing the action
- = **success indicators** – what the HEI will consider is needed to measure the success of the intervention.

Appendix C: References and resources

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During their involvement in ECU's staff disclosure of equality data project, some of the HEIs have produced written publications and materials. These are available to download at www.ecu.ac.uk/inclusive-practice/staff-disclosure-of-equality-data.

ECU aims to continue to expand the resources available on this web page, and would be happy to receive case studies from any other HEIs that have worked on improving staff disclosure.

Aston University

HR Staff Disability Survey

Guidance for Personnel Staff and those arranging selection interviews – making interview arrangements for people with disabilities

Sheffield Hallam University

Working with disabled staff: Sheffield Hallam University's approach to disability disclosure and reasonable adjustments

University of Birmingham

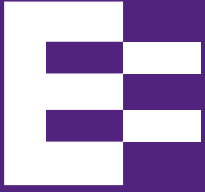
Human Resources Access to Work Guidelines

University of Hull

Staff Disability Disclosure Form

University of Leeds

Building disability confidence – supporting disabled staff at the University of Leeds



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