The public sector equality duty: specific duties for Scotland (revised)

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Background

The Equality Act 2010 replaced previous anti-discrimination law, consolidating it into a single act. The Act introduced new measures that have direct implications for colleges and higher education institutions (HEIs).

The public sector equality duty (PSED) came into force on 5 April 2011, replacing the previous separate equality duties for race, disability and gender. The PSED consists of a general duty supported by specific duties. In Scotland, these were commenced on 27 May 2012. Scottish colleges and HEIs, and the Scottish Funding Council (SFC), are covered by the general duty and the specific duties.

This briefing provides details of the general duty and the specific duties for Scotland, and highlights issues for institutions to consider when developing their approaches to meeting the requirements. It should be read in conjunction with Equality Challenge Unit’s (ECU) briefing Equality Act 2010: implications for colleges and HEIs (see further resources).

Who is covered by the PSED and specific duties?

The legislation lists the governing body or board of management of a college or HEI as responsible for meeting the PSED and specific duties.

Equality and Human Rights Commission (EHRC) Scotland has provided guidance on which individual authorities are covered.

= All HEIs are covered by the duties.
= All colleges are individually covered by the duties. This includes colleges operating in a region or federation, for example, the

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Glasgow colleges or most partner colleges of the University of the Highlands and Islands (note: Argyll College, Highland Theological College, NAFC Marine Centre and Scottish Associated for Marine Sciences are not individually covered).

= The Glasgow Colleges’ Regional Board is covered as a separate authority.

**Examples**

This briefing has been updated to reflect the experiences of HEIs and colleges in meeting and reporting on the specific duties since 2012. Throughout this briefing examples have been drawn from ECU’s analysis of institutional reports and publications. Our aim is to illustrate the variety of effective practices across the sector and to provide a source of ideas and case studies for current institutional practice.

**Extend your knowledge**

EHRC (2016) *Public authorities in Scotland: who is covered by the specific duties?*  
The public sector equality duty

The public sector equality duty (PSED) consists of a general duty and specific duties.

The general duty consists of three main needs (set out in section 149 of the Equality Act 2010). These are underpinned by specific duties (set out in the secondary legislation that accompanies the Act). The specific duties are intended to assist public bodies to meet the general duty.

For the PSED the relevant protected characteristics are:

- age
- disability
- gender reassignment
- pregnancy and maternity
- race
- religion or belief (including lack of belief)
- sex
- sexual orientation

The PSED also applies to marriage and civil partnership, but only in respect of the requirement to have due regard to the need to eliminate unlawful discrimination in employment.

EHRC Scotland is responsible for assessing compliance with, and enforcing, the general duty and specific duties. It has powers to issue compliance notices to colleges and HEIs that fail to comply and can apply to the courts for an order requiring compliance. The general duty can also be enforced by judicial review. This can be sought by EHRC Scotland or any individual or group of people with sufficient interest.
General duty

The general duty requires colleges and HEIs, in the exercise of their functions, to have due regard to the need to:

= eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
= advance equality of opportunity between people from different protected characteristic groups, considering the need to:
  − remove or minimise disadvantages suffered by people due to their protected characteristics
  − meet the needs of people with protected characteristics
  − encourage people with protected characteristics to participate in public life or in other activities where their participation is low
= foster good relations between people from different protected characteristic groups, tackling prejudice and promoting understanding between people from different groups

In order to demonstrate due regard, institutions must consider the three needs of the general duty when making decisions, for example, when:

= developing, evaluating and reviewing policies
= designing, delivering and evaluating services, including education provision
= commissioning and procuring services from others

To comply with the general duty, institutions may treat some people more favourably than others, as far as this is allowed by UK and European anti-discrimination law. The general duty also recognises that disabled people’s requirements may be different from those of non-disabled people. Colleges and HEIs are required to take account of disabled people’s impairments and must make reasonable adjustments to accommodate these.
To reduce the likelihood of unlawful discrimination occurring against students because they or their partners are pregnant or have recently given birth, a HEI introduces a policy and corresponding procedures to support these students. The policy makes clear that the institution will not accept discrimination on the grounds of pregnancy, maternity or caring responsibilities and sets out its study and leave arrangements and support for returning to study. The institution provides training for staff to ensure effective implementation of the policy and procedure.

To encourage more women into engineering to advance equality of opportunity between men and women in this field, a college develops an outreach programme for girls in local schools aimed at attracting them into engineering. It also considers how to promote additional support that all learners may need throughout their course and ensures that equality training is delivered to all staff and students to promote the college’s stance on equality and respect for fellow students.

A college is aware of verbal abuse, bullying and tensions occurring on site between some of its Catholic and Protestant students. To foster good relations between these groups, the college includes a statement on its stance against sectarianism within its student code of conduct which is explained at student induction, included in the student handbook and readily accessible on the college website. It also looks to other colleges and local schools for examples of effective practice and develops a campaign to promote respect for other people’s views, religions or beliefs, including posters and displays around the college and workshops run by an anti-sectarian charity.
Specific duties

In Scotland, the general duty is underpinned by specific duties set by the Scottish parliament. These specific duties commenced on 27 May 2012.

The specific duties aim to help colleges and HEIs to better meet the general duty. They are designed to help institutions develop evidence-based policies and practices, improve transparency and accountability, and deliver better outcomes for everyone in Scotland. It is important to note that institutions must meet both the general duty and the specific duties – it is not enough to meet the specific duties alone.

To meet the specific duties, Scottish colleges and HEIs will need to:

1. report on progress of mainstreaming the general duty into all functions every two years, starting in 2013
2. publish and deliver a set of equality outcomes that cover all protected characteristics (or explain why not all protected characteristics are covered) every four years, starting in 2013
3. assess the impact of new and revised policies and practices against the needs of the general duty on an ongoing basis
4. gather information on the protected characteristics of employees and publish every two years, starting in 2013, as part of mainstreaming reports if not published elsewhere
5. publish board diversity information as part of mainstreaming reports from 2017, including the gender breakdown of governing body or board members and how this information has/will be used to improve diversity amongst members
6. publish gender pay gap information every two years, and publish statements on equal pay and occupational segregation for gender, race and disability every four years, starting in 2013
7. have due regard to the general duty in specified procurement practices on an ongoing basis
8. publish the above information in a manner that is accessible
Learning from previous experience

Colleges and HEIs in Scotland have been working to meet the specific duties since their introduction in 2012. Institutions’ experience of preparing and publishing the required reports since that time should be reflected on, and key lessons used, to inform their approach to each new reporting cycle. Both ECU and EHRC Scotland have published performance reviews that outline key areas for development that will be useful for institutions to reflect upon.

Extend your knowledge

  

  

- **ECU (2015) Reporting on equality: colleges and higher education institutions’ performance of the Scottish specific equality duties requirements in 2015.**
  
  www.ecu.ac.uk/guidance-resources/equality-legislation/performance-specific-duties-scotland-2015/
1 Mainstreaming the general duty

Colleges and HEIs must report on progress made in making the general duty integral to the exercise of the institution’s functions so as to better perform the general duty (regulation 3).

All colleges and HEIs must:

= publish a report by 30 April every two years, starting in 2013 on the progress made in making the general duty integral to the institution’s functions. This is to demonstrate how it is considering the three needs of the general duty when exercising all of its functions.

= as far as practicable, use existing reporting systems such as strategic plans or annual reviews to publish the report, which must be accessible to the public.

= include in the report employment information, as specified in regulation 6 (if not published elsewhere), including:

  − an annual breakdown of any employment information gathered that has not previously been published in a report
  
  − details of the progress that has been made in gathering and using employment information to better perform the general duty

(See section on employee information for further details.)

= include in the report information on the institution’s governing body as specified in regulation 6A, including:

  − the number of men and of women who have been members of the governing body during the period covered by the report
  
  − the way in which information on the protected characteristics of governing body members has been used, and will be used, in taking steps towards there being diversity amongst governing body members

(See section on board diversity information for further details.)
What is mainstreaming?

Mainstreaming sets out to integrate consideration of equality into a college or HEI’s functions so that it is a routine part of its day-to-day workings. It means ensuring that equality sits at the heart of a college or HEI’s mission, strategy and operational delivery in order to create both a structure and a culture that embraces and advances equality and diversity.

Although there is no single way to mainstream equality, operationally mainstreaming starts with considering how to meet the three needs of the general duty for all of the relevant protected characteristics when exercising functions, including core functions and processes such as budget setting, human resource management and procuring services, and processes for discrete projects and activities. An institution-wide, strategic approach across the institution’s functions will be required. However, it will also be necessary to work with the staff and student body to create the values, behaviours and culture that will support the application of mainstreaming and ensure equality translates into the day-to-day practice of the institution.

ECU recommends that colleges and HEIs take into consideration the following recommendations which have facilitated mainstreaming across institutions in Scotland:

- gain support from the highest level within the institution to create the impetus for mainstreaming and drive its implementation
- tackle mainstreaming at a strategic level, promoting the benefits of an inclusive institution and addressing functions and related policies in order to achieve consistent application at departmental levels
- use a holistic approach rather than considering aspects of an institution’s delivery in isolation
- change practice at the individual level through addressing policies and processes, and working with staff to promote positive attitudes and changes in practice
- create and utilise a robust evidence base, drawing on both internal and external research and information, to:
  - reveal hidden inequalities, including unequal outcomes and areas of segregation, which can be addressed in the operation of an institution's functions
Approaches to mainstreaming reporting

- demonstrate that mainstreaming of equality is taking place through monitoring and review processes
- make the institution’s approach appropriate for its own context and culture
- build on any mainstreaming work undertaken under the previous equality duties for race, gender and disability

**Extend your knowledge**

ECU (2011) *Mainstreaming: equality at the heart of further and higher education.*

www.ecu.ac.uk/publications/mainstreaming-equality-at-the-heart-of-he

ECU (2012) *Mainstreaming: equality at the heart of further and higher education: final reports.*

www.ecu.ac.uk/publications/mainstreaming-equality-at-the-heart-of-higher-education-final-report/

Colleges and HEIs must report on the progress made in making the general duty integral to the exercise of its functions so as to better perform the general duty. The report should show how the institution’s functions are contributing to eliminating discrimination and other unlawful conduct, advancing equality of opportunity and fostering good relations. Progress made, rather than activity undertaken, should be the focus of reports, and evidence is required to demonstrate this.

Colleges and HEIs must use, as far as possible, existing reporting mechanisms, such as annual reports or reviews, to report on mainstreaming the general duty. The report must be published in a manner that is accessible to the public.

A variety of effective approaches have been developed by institutions since 2013. These include:

- structuring reports to present evidence of progress relating to each need of the general duty
- use of key success measures, such as survey results or staff or student statistics, to demonstrate change achieved from one report to the next
use of case studies to show progress within different functions of the institution

tools/processes used for collecting evidence of mainstreaming from across functions, for example drawing on self-evaluation processes

providing analysis of employee and student equality data rather than simply the data

matrices or tables to provide an overview of progress

diagrams and infographics to show mainstreaming in different functions and processes

Examples of mainstreaming reporting (2015)

City of Glasgow College
The college conducted a systematic review across functions to determine its progress in mainstreaming. It presented the results in a ‘mainstreaming matrix’, which provides a one-page high-level overview of progress in mainstreaming in directorates and functions, including evidence for each area, and alignment with college strategy and the three needs of the PSED. The college also used a variety of diagrams, infographics, case studies and examples from across its functions to illustrate mainstreaming.


Glasgow Clyde College
To prepare its 2015 report, the college created a matrix for mapping mainstreaming actions, which it required each academic faculty and support function to complete. This process captured the breadth of mainstreaming activity across the college, and was subsequently embedded into the college’s self-evaluation process to inform action planning.

University of Glasgow

The university structured its report around the three needs of the PSED, presenting examples of mainstreaming for each. They also included a section on structural examples, such as work relating to its committee structure, and a section on external influences on mainstreaming, such as its SFC outcome agreement.

www.gla.ac.uk/services/humanresources/equalitydiversity/equalityact/#/publicsectorequalityduty(psed)-april2015update

Royal Conservatoire of Scotland

The conservatoire’s report used case studies and personal stories to show the impact its equality work had had on individuals. Staff survey results, quotes and tweets were included to add additional evidence to the report’s narrative.


2 Equality outcomes

Colleges and HEIs must develop, publish and deliver a set of equality outcomes every four years (regulation 4).

Colleges and HEIs must:

= prepare and publish a set of equality outcomes every four years, starting in April 2013, to enable the college or HEI to better perform the general duty

= when developing the outcomes, consider relevant evidence relating to people who share a relevant protected characteristic, and take reasonable steps to involve people with those characteristics, or who represent those with a relevant protected characteristic

= publish reasons if the set of equality outcomes does not cover every relevant protected characteristic

= review and publish a report on progress made towards achieving the set of equality outcomes every two years, starting in 2015
What is an equality outcome?

An equality outcome is a result that the institution will achieve to further one or more of the needs of the general duty within a four year period. It is a change that will result as a consequence of institutional action that will improve equality for individuals, communities or society. For example, improved participation or attainment, and changes in skills, attitudes, behaviours and environmental conditions.

‘By focusing on outcomes rather than objectives, this specific duty aims to bring practical improvements in the life chances of those who experience discrimination and disadvantage. So in practice, you might find it helpful to think of equality outcomes as results intended to achieve specific and identifiable improvements in people’s life chances.’

EHRC Scotland

In order to achieve this, an equality outcome needs to express the result rather than the aim or activity. It also needs to be presented with details of which need of the general duty it will help meet, and for which protected characteristic group/s, and how it will be measured.


**Forth Valley College:** Learners with protected characteristics progress equally onto positive destinations.
www.forthvalley.ac.uk/media/1347/equality-outcome-plan.pdf

**University of Stirling:** The proportions of (a) women studying SET subjects and sport; and (b) men studying nursing, education and social science subjects will be increasingly in line with the overall gender profile of Stirling students.
www.stir.ac.uk/media/services/registry/planning/EqualityOutcomes2013-17.pdf

**Ayrshire College:** Students and staff find that positive mental health and wellbeing is promoted and improved within the college.
www1.ayrshire.ac.uk/media/3033/eo-snapshot.pdf

**University of Glasgow:** Increase the diversity of the professoriate and management positions, specifically in gender and ethnicity.
www.gla.ac.uk/media/media_275631_en.pdf
For analysis of the outcomes published by Scottish colleges and HEIs in 2013, see ECU’s briefings below. Please note that some colleges later republished their outcomes post-merger.


[www.ecu.ac.uk/publications/college-equality-outcomes-a-regional-overview/](http://www.ecu.ac.uk/publications/college-equality-outcomes-a-regional-overview/)

**Preparing and publishing equality outcomes**

ECU has provided guidance on setting equality outcomes, which suggests a process of three stages to undertake when reviewing previous outcomes and designing and publishing new outcomes.

Stages in the process of setting equality outcomes:

- **investigate equality issues** – review previous outcomes, consider evidence, involve people
- **identify equality outcomes** – prioritise, formulate, assign, gain approval
- **disseminate equality outcomes** – publish, promote

Please refer to the document below for full guidance on setting equality outcomes.

[www.ecu.ac.uk/publications/setting-equality-outcomes-guidance-for-scottish-institutions/](http://www.ecu.ac.uk/publications/setting-equality-outcomes-guidance-for-scottish-institutions/)

ECU recommends that senior management is involved at an early stage in the development of equality outcomes to demonstrate institutional commitment and ensure that outcomes are aligned with the college or HEI’s strategic priorities, business planning and reporting processes.
Considering relevant evidence

For example, look to align outcomes to:

- mission or value statements
- strategic plans
- key performance indicators
- institutional or regional outcome agreements with the Scottish Funding Council (SFC)
- external benchmarks (for example national student survey, Scottish census)
- sector benchmarks (for example ECU’s statistical reports)

In developing their set of outcomes, colleges and HEIs must consider relevant evidence relating to people who share a relevant protected characteristic.

Gathering and analysing evidence from across the protected characteristics will help to determine the key equality issues for the college or HEI and help to develop outcomes that are relevant and specific to the institution and provide the basis against which to measure progress towards those outcomes.

Colleges and HEIs can consider existing institutional equality data such as employment and student monitoring information, complaints and grievances, results of impact assessments and institutional research along with relevant national and regional evidence disaggregated by protected characteristic. Qualitative data and evidence such as that from surveys, involvement activities or feedback forms can also help inform a college or HEI’s understanding of the most significant equality issues for their institution, particularly for characteristics where there may be a lack of ‘hard data’ about the needs and experiences of different groups.

For a comprehensive list of evidence sources see ECU’s guidance on setting equality outcomes.

www.ecu.ac.uk/publications/setting-equality-outcomes-guidance-for-scottish-institutions/
Involving staff, students and representatives

Colleges and HEIs are required to take reasonable steps to involve people who share a relevant protected characteristic – and any people who represent the interests of those groups – when developing their set of equality outcomes. This will ensure that outcomes are meaningful and relevant to staff and students and can provide the opportunity to gather qualitative evidence to refine and prioritise outcomes, as well as developing actions to achieve them.

Ongoing involvement can help to measure the progress and impact of the outcomes and promote an inclusive and responsive culture more generally.

To help maximise involvement, consider a number of contextual factors, such as accessibility, location and timing.

ECU recommends that colleges and HEIs also involve staff and students in other processes, for example when:

Examples

The University of Aberdeen listed the evidence (quantitative and qualitative from a range of formal and anecdotal sources) that had informed each of its equality outcomes.

For its first equality outcome, ‘the principles of equality and diversity will be a day-to-day consideration within all of the university’s activities, both strategically and operationally’, this included:

- discussions at meetings (college executive committees; advisory group on equality and diversity)

- staff equality and diversity questionnaire – nearly 20% of respondents had no knowledge of the Equality Act 2010 and 25% had no knowledge of the equality and diversity webpages

- ongoing discussions regarding the implementation of equality impact assessments and whether they are always undertaken at the appropriate point in policy development

www.abdn.ac.uk/staffnet/governance/equality-and-diversity-277.php
Involving external stakeholders

Involving national and regional equality groups and the local community will help colleges and HEIs to consider relevant equality issues and evidence to inform their outcomes. Colleges and HEIs should build on previous work undertaken around consultation and involvement. For some institutions, there may be small numbers of people with a relevant protected characteristic (for example, trans students) so the institution may wish to involve a trans representative equality group or local trans groups to help identify needs and patterns of disadvantage.

Examples

The University of Strathclyde listed the 19 external organisations it invited to contribute to its outcomes consultation exercise in the appendix to its equality outcomes scheme. It also outlined the internal approval process which involved the staff committee, equality strategy committee and university court.


Publishing reasons

The Scottish government expects all public authorities to set outcomes spanning the protected characteristics. Colleges and HEIs should publish reasons if their equality outcomes do not cover all of the relevant protected characteristics. Each individual outcome need not cover all relevant protected characteristics but if a relevant protected characteristic is not covered across the set of outcomes, a college or HEI will need to publish reasons to explain why.

Measurement of equality outcomes

Outcomes need to be designed in a way that will facilitate measurement and reporting of progress. Setting out the difference the outcome aims to achieve and how this difference will be known will help institutions make an equality outcome measurable. In some cases, an outcome will lend itself to

- assessing the equality impacts of the college or HEI’s policies and practices
- considering and designing actions and initiatives relating to the PSED
Reporting on progress

Colleges and HEIs must review and publish a report on the progress they have made towards achieving their outcomes twice: two years and four years after their publication. This can be as part of an established mechanism or report and does not have to be a new or separate report. As with mainstreaming reporting, progress made, rather than activity undertaken, should be the focus of reports, and evidence is required to demonstrate this.

Examples of reporting on progress (2015)

Glasgow Caledonian University (GCU)

In its 2015 report on progress, GCU described and evidenced change and impact, including through use of benchmarking data to compare their progress with the wider sector. Their equality outcomes reporting was clearly presented in a tabular format with a column on ‘what difference this has made’. They also made effective use of infographics to demonstrate impact. www.gcu.ac.uk/equality/equalityanddiversityatgcu/equalityoutcomesframework

Glasgow School of Art (GSA)

GSA clearly and succinctly described progress and activity undertaken for each outcome, and supplemented this with a section analysing impact to date and/or anticipated impact for each outcome, which used quantitative, qualitative and anecdotal evidence. GSA also presented success measures

Extend your knowledge


a quantitative target against which progress can be measured, such as a specific increase in the number of students with a particular characteristic. However, for some areas it may not be appropriate or possible to include a numerical target, but how progress will be measured can be expressed in a range of ways, for example through indicators of changes in staff or student behaviours.
3 Assessing the equality impact of policies and practices

Colleges and HEIs must assess the impact of any new or revised policies and practices on their ability to advance the three needs of the general duty (regulation 5).

Assessing the impact of proposed or revised policies can help to identify not only a discriminatory impact but also the positive impact of policies and practices and how the institution can better meet the three needs of the general duty. It contributes to the drive for continuous improvement and quality enhancement, supporting the institution’s mission, for example providing the best educational experience; being an employer of choice for staff. It is also an important tool in ensuring that robust and appropriate decisions are made during key institutional developments, such as redundancy processes or mergers.

Policies and practices has a broad meaning according to EHRC Scotland.
Specific requirements

The duty requires public authorities to assess the impact of applying a proposed new or revised policy or practice against the needs of the equality duty: ensuring that the policy does not discriminate unlawfully, considering how the policy might better advance equality of opportunity, and considering whether the policy will affect good relations between different groups.

This is different to the previous requirements around impact assessment which involved assessing the impact of policies and practices on people who share protected characteristics.

Colleges and HEIs must:

- assess the impact that proposed new or revised policies and practices may have on the institution’s ability to fulfil the three needs of the general duty in relation to all relevant protected characteristics
- consider evidence relating to people with protected characteristics when making the assessment (including any evidence received from people with relevant protected characteristics)
- take account of the results of any assessment when developing and applying the policy or practice
- record the assessment so that, if the policy or practice is applied, the results may be published in a reasonable manner and within a reasonable period
- make arrangements as appropriate to review and where necessary change or revise existing policies and practices to ensure the institution complies with the general duty

It is important to be aware that considering whether or not to conduct an impact assessment of a policy or practice (such as an equality screening) is not in itself sufficient to assess impact.
### Timing of assessments

The duty is ongoing, so impact assessment should be built into policy and practice development and review processes across the functions of the institution.

The duty applies to both new and revised policies and to existing policies. Colleges and HEIs may want to make arrangements to prioritise the review of existing policies or practices. For example, they could prioritise policies that are most likely to impact on the general duty such as budget decisions or the withdrawal of a service. EHRC Scotland advises that:

> it is good practice to publish a timetable for review and revision work to take place.

EHRC Scotland (2012)

This will aid transparency and accountability.

Impact assessments should take place at the beginning of a policy or practice review or development process, rather than at the end. This ensures findings of the assessment can inform the final policy or practice.

Policies and practices must be assessed for impact on the general duty before a decision is taken or the policy is adopted or revised.

### Acting on the results of assessments

The regulations require institutions to take account of the results of any assessment when developing and applying the policy or practice in question.

Where a particular policy or practice is found to have a discriminatory impact on a protected group, colleges and HEIs should either take action to address any issues identified, including exploring alternative policies or practices to remove or mitigate any negative impacts, or justify their actions within...
the constraints of the law. ECU recommends that colleges and HEIs record and justify actions and decisions taken during the assessment as evidence of having paid due regard. Justification will be needed if a legal challenge is made.

**Compound impact**

EHRC Scotland notes in its guidance on assessing impact that it is important to consider not only individual policies and practices and how they impact on the general duty but also the effect of several or a group of policies or practices which together may have a cumulative effect. This requires institutional oversight of impact assessments at a senior level.

**Involving people**

Although involving people with relevant protected characteristics is not specifically required under this specific duty, colleges and HEIs may choose to involve people and groups with relevant protected characteristics to help understand the impact of a proposed or revised policy or practice. This can help fulfil the requirement for considering evidence as part of an impact assessment.

**Staff development**

Increasing staff capacity and developing skills to undertake impact assessment are important to ensuring assessments take place across the institution in a systematic and consistent manner.

ECU's training materials for impact assessment provide a five step process and templates (pages 8–14) that may be useful when considering approaches to assessing impact and staff development. [www.ecu.ac.uk/publications/building-capacity-for-equality-impact-assessment-in-colleges-handbook-for-trainers/](http://www.ecu.ac.uk/publications/building-capacity-for-equality-impact-assessment-in-colleges-handbook-for-trainers/)

**Approaches to impact assessment**

The regulations do not prescribe what the arrangements for assessing impact should be beyond the requirements noted above. Assessment of impact is intended to be carried out within a college or HEI's existing mechanisms and frameworks of assessment. Colleges and HEIs can be flexible in their approach as different types of policies and practices may require different approaches.
Colleges and HEIs must gather and use information on employees (regulation 6).

Each year, colleges and HEIs must:

- take steps to gather information on the number and relevant protected characteristics of their employees, including information on recruitment, development (career progression) and retention
- use that information to better perform the general duty
- report on this information within their mainstreaming report, if not elsewhere, (which must be published not later than 30 April every two years, starting in 2013) including:
  - an annual breakdown (covering the previous two years) of information gathered
  - details of progress made in gathering and using information to better perform the general duty

Gathering and using employee information across all the relevant protected characteristics can also help colleges and HEIs demonstrate due regard to the three needs of the general duty, and support impact assessment and development of evidence-based equality outcomes.

**Extend your knowledge**

What information should be gathered and used? The Scottish government has advised that colleges and HEIs should collect, monitor and use the following information to demonstrate that they are taking steps to consider recruitment, development and retention:

- recruitment and promotion
- part-time and full-time staff
- pay and remuneration
- training and development
- return to work of women on maternity leave
- return to work of disabled employees following absences related to their disability
- appraisals
- grievances (including about harassment)
- disciplinary action (including for harassment)
- dismissals and other reasons for leaving

A list of some information that colleges and HEIs may find useful to collect and analyse can be found at the end of this briefing.

ECU recommends that information is gathered across all of the protected characteristics. Where colleges and HEIs are not already collecting information on a particular protected characteristic, or where disclosure is low, ECU recommends that institutions seek to develop a safe and supportive environment through comprehensively demonstrating a commitment to equality and providing clear reasons for collecting data and explaining how it will be used. Colleges and HEIs must not compel employees and prospective employees to disclose information and must not publish information if to do so would legally breach confidence or the Data Protection Act 1998.

Colleges and HEIs will need to consider what questions they ask staff relating to their protected characteristics to get an accurate profile of their workforce.
Colleges and HEIs may publish both quantitative and qualitative information. ECU recommends that colleges and HEIs consider the range of information they already collect and how this can be extended to all protected characteristics. This will include:

- information provided to Higher Education Statistics Agency (HESA) (HEIs)
- information provided to the SFC (colleges)
- staff satisfaction surveys
- human resources records
- equal opportunities monitoring forms
- evidence from involvement, engagement and consultation exercises
- information on how institutions have assessed the impact of their policies and practices on different protected characteristics

### Student data and information

Although gathering and using data on students is not a requirement under the specific duties, institutions will need to gather and use information on their students to demonstrate how they are meeting the general duty and other requirements of the duties, particularly setting outcomes based on evidence and assessing impact of policies and practices.

### Demonstrating use of information

In order to demonstrate that information is being used to better perform the general duty, it is advisable to include analysis of the employment information published, including identification of any

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**Extend your knowledge**

ECU (2016) Research and data briefing 1: working with data.  

ECU guidance on monitoring questions:  
www.ecu.ac.uk/guidance-resources/using-data-and-evidence/monitoring-questions/

ECU guidance on encouraging disclosure:  
www.ecu.ac.uk/guidance-resources/using-data-and-evidence/encouraging-disclosure-equality-info/
equality issues and how these have or will be addressed, such as through relevant equality outcomes. Published information will be more accessible if key trends and inequalities are pointed out or if a short narrative explaining these points accompanies the data.

ECU recommends that colleges and HEIs use national evidence to enable comparison and provide context. It is useful to involve colleagues responsible for holding and analysing information in this process. National evidence may also help to identify long-standing inequalities which institutions may choose to explore locally.

How employment information is being used in processes like impact assessment and policy development is relevant to report on, as are examples from staff focused equality projects or initiatives being undertaken like Athena SWAN.

**Approaches to reporting employee information**

In institutions’ 2015 reports, effective methods for conveying employee equality information included:

- summaries of key statistics on protected characteristics of staff and students within mainstreaming reports, with data tables in appendices or full reports published elsewhere
- analysis focusing on comparison of 2013 data with 2015 data
- analysis of disclosure rates for all protected characteristics, including changes since 2013
- specific sections outlining progress made in gathering and using employee information

**Examples of employee data reporting (2015)**

**Glasgow Kelvin College**

The college provided a detailed analysis of employee information as an appendix to their mainstreaming report. It provided analysis with illustrative data tables and stats to cover staff composition, recruitment, retention and development by all but two protected characteristics. A comprehensive learner profile was also included. [www.glasgowkelvin.ac.uk/wordpress/wp-content/uploads/2015/04/GlasgowKelvinCollege-Mainstreaming-Report2015-final-tag.pdf](http://www.glasgowkelvin.ac.uk/wordpress/wp-content/uploads/2015/04/GlasgowKelvinCollege-Mainstreaming-Report2015-final-tag.pdf)
5 Governing body diversity information

Colleges and HEIs are required to publish information on the diversity of their governing bodies or boards of management (regulation 6A). This requirement was brought into force via an amendment to the specific duties in 2016. It aims to promote greater diversity amongst the members of the boards of Scotland’s public authorities.

The governing body or board of management of each college and HEI is covered by this requirement, as is the Glasgow Colleges’ Regional Board (on a different timescale, see timeline at the end of this document).

From 2017 onwards, governing bodies or boards of management are required to publish within the institution’s biennial mainstreaming report:

- the number of men and of women who have been members of the governing body during the period covered by the report
- the way in which information on the protected characteristics of governing body members has been used, and will be used, in taking steps towards there being diversity amongst governing body members in relation to all relevant protected characteristics

Role of Scottish ministers in gathering board diversity information

The duty requires Scottish ministers, from time to time, to gather information confidentially about the protected characteristics of listed authorities’ board members, collate this information and report it back to each institution in a manner that ensures confidentiality and anonymity.
Institutions are required to use the information they receive back from the government to better meet the PSED, and to meet the specific requirements listed above.

Scottish ministers will publish anonymised national and sectoral level information on the relevant protected characteristics of members of boards of listed authorities after each information gathering exercise. This will assist with institutional benchmarking.

For further information, please see EHRC Scotland’s guidance.


**Encouraging disclosure by members**

To maximise completion of the monitoring information by members, which will provide more robust and useful data, it is helpful for the institution to prepare the governing body or board for the exercise. Giving warning that it will be taking place and voicing institutional support for the activity may encourage members to participate. Explaining that the exercise will help the institution to meet its equality duties, and providing assurances of confidentiality and how the data will be used may also be helpful.

Many institutions conduct their own monitoring exercises with their governing body or board. This may occur more frequently than the government-led exercise, so will be helpful to retain. It may, however, be necessary to explain to members why both exercises take place so that participation in neither exercise suffers.

**Publishing information on board diversity**

As governing bodies and boards are small, confidentiality and anonymity should be considered when publishing any equality data. EHRC Scotland advises that only data relating to gender should be published due to small numbers of other protected
characteristics potentially compromising anonymity. This can be explained in any published report. Nevertheless, the institution can use data on other characteristics internally to inform any actions it designs to increase diversity in relation to all protected characteristics.

When publishing diversity data, it is helpful to provide benchmarks to show the position of the governing body or board in comparison with sector averages or regional demographic data. Analysis should accompany the data to enhance accessibility of the information. Where available, data from previous years should be used to demonstrate progress.

**Examples**

**University of the West of Scotland**

The university was one of the only institutions to include diversity data relating to its governing body in its 2015 mainstreaming report. They included statistics and brief analysis of the gender balance of their court, senate and executive.

[www.uws.ac.uk/uploadedfiles/flexible_page_content/about_uws/overview/equality_and_diversity/schemes_and_policies/equality%20report%202015.pdf](http://www.uws.ac.uk/uploadedfiles/flexible_page_content/about_uws/overview/equality_and_diversity/schemes_and_policies/equality%20report%202015.pdf)

The following publications provide gender diversity benchmarks for HEI governing bodies.


- **ECU (2016)** *Governing bodies, equality and diversity: handbook for governors.*
  [www.ecu.ac.uk/publications/governing-bodies-2016/](http://www.ecu.ac.uk/publications/governing-bodies-2016/)

- **Leadership Foundation for Higher Education and ECU (2016)** *Online equality toolkit for governors.*
Taking steps to increase diversity

The duties require publication of plans to improve governing body or board diversity within biennial mainstreaming reports.

Positive action provisions permit proportionate action which has the aim of enabling or encouraging people who share a protected characteristic to overcome or minimise a disadvantage connected to that characteristic, meet any needs that are different from the needs of those who do not share that characteristic, or participate in an activity where their participation is disproportionately low.

Many institutions are already trialling positive action approaches in an attempt to increase the diversity of their governing bodies. These include:

- establishing policies and goals on increasing the diversity of the governing body
- raising awareness of the role of the board member or governor
- working with employers to publicise the benefits of board positions
- wide and targeted advertising, specifically inviting underrepresented groups
- communicating the desirability of diversity to electing and appointing bodies, such as academic boards and students’ unions

ECU conducted research with HEI governing bodies in 2014 to find out what approaches were taking place and what was proving effective. See the report below for further details: [www.ecu.ac.uk/publications/governing-bodies-equality-and-diversity-in-scottish-higher-education-institutions/]
Gender pay gap information

Colleges and HEIs are required to publish gender pay gap information (regulation 7).

Following amendments made to the specific duties in 2016, all institutions with 20 employees or more must publish information on the percentage difference between men’s and women’s average hourly pay (excluding overtime) by 30 April 2017 and every two years after that. Previously, the duty extended only to institutions with 150 employees or more.

Gender pay gap information should:

= be based on the most recent data available
= as a minimum, present a gender pay gap figure for the institution as a whole
= include all staff, including full-time and part-time staff, zero hours’ staff and those at the most senior levels of the institution, to give an accurate picture of the difference between women’s and men’s pay
= be provided as both mean and median calculations to illuminate different aspects of gender pay gap information
= present pay gaps in favour of men as negative numbers and pay gaps in favour of women as positive numbers to support consistency in reporting
= explain the methodology used for the calculations
= be presented with benchmarks for example national and sectoral pay gap information
= include commentary on progress, for example changes in gender pay gaps since the last report, and the causes of pay gaps
= include commitments to action to address pay gaps (see equal pay statement section below)

The duty does not specify the manner in which the information must be published for example in a separate report or within the mainstreaming report, however it must be easily accessible to the public.
While the duty does not require pay gap information relating to other protected characteristics, institutions may find it helpful to undertake analysis on other characteristics, including disability and race in particular, to support their work to meet the equal pay statement duty (see below).

**Extend your knowledge**


EHRC *Equal pay audit toolkit.*

ECU (2010) *Promoting equality in pay: a practical resource for conducting equal pay reviews in higher education.*
[www.ecu.ac.uk/publications/promoting-equality-in-pay](http://www.ecu.ac.uk/publications/promoting-equality-in-pay)

ECU’s annual HEI staff statistical report presents UK and Scottish pay gap figures:

A range of publications are available from Close the Gap to support gender pay gap and equal pay statement preparation:
[www.closethegap.org.uk/content/resources/](http://www.closethegap.org.uk/content/resources/)

**Examples of gender pay gap reporting (2015)**

**Queen Margaret University (QMU)**

QMU published a separate equal pay review report, which provided overall and by grade pay gap data and analysis for all staff, as well as for academic staff and support staff for gender, race and disability. QMU compared its findings to 2012 and set actions for improvement. They were the only HEI to have a pay gap in favour of women in 2015 (0.3%).
[www.qmu.ac.uk/equal/equality-policy.htm](http://www.qmu.ac.uk/equal/equality-policy.htm)

**Robert Gordon University (RGU)**

RGU published a detailed equal pay audit, conducted in December 2014. This presented the overall gender pay gap,
the gender pay gap by part-time and full-time staff, and pay gaps by grade, accompanied by analysis. It also presented the ethnicity pay gap, disability pay gap and pay gaps by age group.

www.rgu.ac.uk/about/planning-and-policy/equality-and-diversity/contacts-information-and-statistics

Dundee and Angus College

The college published its gender pay gap information as part of its mainstreaming report. The college reported its overall pay gap, making comparisons with the position in 2013, and provided analysis as to the causes of the pay gap, including horizontal occupational segregation.

dundeeandangus.ac.uk/dmsdocument/237

Equal pay statements

Colleges and HEIs with 20 employees or more also have a duty to publish a statement on equal pay (regulation 8) by 30 April every four years.

Until the 2016 amendments to the specific duties, this duty previously only applied to institutions with 150 staff or more. In 2017, institutions with between 20 and 149 staff must publish an equal pay statement relating to gender only. These institutions will be required to include disability and race in their statement by 2021. In 2017, institutions with 150 staff or more are required to publish equal pay statements on gender, disability and race.

Statements must contain:

- For institutions with 150 staff of more:
  - the institution's policies on equal pay between men and women; between people who are disabled and people who are not; between people of minority racial groups and people who are not
  - information on occupational segregation in relation to gender, disability and race (the concentration of men and women, disabled and non-disabled, and different ethnic groups in particular grades and in particular occupations)
For institutions with between 20 and 149 staff:

- the institution’s policies on equal pay between men and women (2017 onwards); between people who are disabled and people who are not; between people of minority racial groups and people who are not (2021 onwards)

- information on occupational segregation in relation to gender (2017 onwards) and disability and race (2021 onwards) (the concentration of men and women, disabled and non-disabled, and different ethnic groups in particular grades and in particular occupations)

The duty does not specify the manner in which the statement must be published for example in a separate report or within the mainstreaming report, however it must be easily accessible to the public.

**Equal pay policy**

Equal pay statements must contain the institution’s policy on equal pay. EHRC Scotland suggests that an equal pay policy might include the following:

- a commitment that the institution will carry out an equal pay review or audit
- a commitment to monitor pay regularly in partnership with trade unions or employee representatives
- the institution’s objectives on equal pay
- actions that will be taken
- a named senior manager who will be responsible for the policy’s implementation
- a commitment that the institution will apply appropriate resources to achieve equal pay

**Occupational segregation reporting**

Occupational segregation is a term that is used to describe employment patterns where workers with certain characteristics tend to be grouped in certain jobs. Previous research has shown that occupational segregation is one of the main causes of the pay gaps in the United Kingdom. Understanding the scope and causes of occupational segregation is key to tackling gender, disability and ethnicity pay gaps within institutions.
‘Tackling occupational segregation is not simply a question of progressing gender equality in Scotland; it is also beneficial to Scotland’s overall social and economic wellbeing. We need to ensure that the pool of talent and skills available to employers is not inhibited by stereotypical perceptions of what women and men ‘do’, and that everyone’s skills are being utilised to the maximum potential.’

Scottish government (2014)

There are two main dimensions to occupational segregation:

- horizontal segregation: workers with certain characteristics are clustered in certain types of jobs across an organisation
- vertical segregation: workers with certain characteristics are clustered at certain levels of jobs within an organisation’s hierarchy

The regulations do not specify how detailed occupational segregation reporting needs to be. The following may be helpful.

- use job families and jobs grades to undertake analysis
- consider both vertical and horizontal occupational segregation
- include commentary and analysis on the causes and consequences of occupational segregation
- outline actions that will or have been taken to address occupational segregation, including work linked to equality outcomes

While only gender, disability and race are specifically required, it is good practice to extend consideration of occupational segregation to all protected characteristics.

‘In meeting the general equality duty, public authorities may choose to gather and consider evidence and publish information on occupational segregation across all protected groups.’

EHRC Scotland (2016)

ECU’s 2014 research report on occupational segregation in relation to gender, disability and race in Scottish HEIs provides national patterns and recommendations:

7 Considering public procurement

Colleges and HEIs must give due regard to the general duty in contractual conditions and award criteria (regulation 9).

Colleges and HEIs must, when relevant and proportionate to the subject matter of an agreement for goods, works or services, have due regard to whether the award criteria and the contract conditions should include considerations to enable it to better perform the general duty.

This duty cannot be delegated. This means that HEIs and colleges remain responsible for the general duty when a good or service is delivered through a contractor or supplier. They will therefore need to require contractors and suppliers to take steps to enable them to meet the general duty. This includes procurement undertaken via a procurement agency.

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Examples of equal pay statements (2013 and 2015)

**Perth College, University of the Highlands and Islands**

The college published a comprehensive equal pay statement in 2015. This contained its equal pay policy, gender pay gap information and occupational segregation analysis, an update on its pay gap action plan since 2013, and its planned actions for 2015–2017.


**Heriot-Watt University**

In 2013, the university published a report containing both its gender pay gap information and equal pay statement. This contained detailed analysis of both vertical and horizontal occupational segregation, including an explanation of methodology, and a series of recommendations. The report concluded by outlining how the recommendations were used to inform the development of the university’s equality outcomes.

[www.hw.ac.uk/services/docs/Equal_Pay_2013.pdf](http://www.hw.ac.uk/services/docs/Equal_Pay_2013.pdf)

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EHRC Scotland (2016) *Employment information and the PSED.*

Colleges and HEIs should ensure those responsible for procurement are supported to determine when the subject matter of a contract is of high relevance to the general duty. Procurement procedures and key documentation, such as vendor questionnaires and standard terms and conditions, should be reviewed to ensure they reflect the institution’s obligations under the Equality Act and general duty more generally.

EHRC Scotland (2013) *Procurement and the PSED.*

ECU (2012) *Equality through procurement in further and higher education.*
www.ecu.ac.uk/publications/equality-through-procurement-fe-and-he/

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### 8 Publishing information accessibly

Colleges and HEIs must publish the information and reports required by the specific duties in a manner that is accessible to the public (regulation 10).

Colleges and HEIs must use an existing means of public performance reporting as far as possible.

ECU recommends colleges and HEIs develop a communication strategy to ensure that the information is easily available to as wide an audience as possible. Some key considerations include:

- use clear titles for reports to make it clear which duties are included and which year/s reports relate to
- if publishing all of the required information in one report, ensure this is clear in terms of the title and sections of the report
- position report/s on a webpage that is easy for people to locate and makes logical sense for example on an equality and diversity page
- if reports are positioned on different webpages, for example staff data on a HR page, ensure there are links between these webpages to enable people to easily find all of the required information
- for longer reports, consider publishing summaries to increase engagement with the content
- where information highlights an equality issue, provide commentary to support the public in interpreting the information
Examples of information to collect

The following information set is illustrative and may help colleges and HEIs consider what information to collect, analyse and publish.

Ultimately, colleges and HEIs should decide what information to publish that will demonstrate meeting the general and specific duties.

### Staff

Number (and percentage) of people who share a protected characteristic:

- overall
- by department
- by grade
- by job type
- by contact type (fixed-term, permanent or open-ended)
- by full-time or part-time status
- by occupation

Members of decision making bodies/committees:

- senior management position
- member of governing bodies/boards
- members of key decision making committees or groups

Recruitment by protected characteristic:

- number of applicants to positions
- number of shortlisted applicants
- number of applicants invited to interview
- number of successful applicants

Progression by protected characteristic (termed ‘development’ in employment information duty):

- number of people going for promotion
- number of successful applicants
Pay information by protected characteristic:
= information on pay audits
= pay gaps

Workplace environment and practices:
= number of people taking flexible working
= number of people who have been pregnant in last year
= number of people who have taken up maternity, paternity or adoption leave
= number of staff returning from maternity, paternity or adoption leave
= number of staff remaining in employment 12 months after returning from maternity, paternity and adoption leave
= training opportunities
= staff satisfaction surveys
= reported incidents of hate crime
= grievances
= disciplinaries
= dismissals and other reasons for leaving

Research Excellence Framework (REF) (HEIs only):
= application and selection for submission to the REF

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Students

Although colleges and HEIs are not required to collect and publish data on students to meet their specific duties (unlike regulations 6, 7 and 8 for staff data), colleges and HEIs will need to collect and use data on students to prepare a set of outcomes and assess the impact of policies.

The following information set is illustrative and colleges and HEIs will need to decide what information they need to collect in order to meet the general duty.
Number (and percentage) of people who share a protected characteristic:

- by full-time or part-time study
- by mode of study (distance, attendance etc.)
- by subject
- by SCQF level of study (colleges)
- by undergraduate first degree
- by undergraduate other degree
- by postgraduate teaching
- by postgraduate research

Admissions:
- number of applicants
- number of applicants invited to interview (where applicable)
- number of successful applicants

Retention and progression
- number of early and further withdrawals (colleges)
- number of withdrawals year on year (HEIs)

Attainment:
- percentage of students achieving each completion outcome (colleges)
- percentage of students achieving each class of degree (HEIs)

Career opportunities:
- number of people on work placements and targeted programmes
- destination of leavers by protected characteristic
Student experience:

- access and take-up of services by protected characteristic (for example student support)
- results of student satisfaction surveys
- complaints
- disciplinaries
- reported incidents of hate crime
Further resources

www.ecu.ac.uk/publications/equality-act-2010-revised/

ECU updates and guidance on equality legislation and implications for higher education institutions and colleges:
www.ecu.ac.uk/guidance-resources/equality-legislation/

EHRC Scotland guidance and resources on the public sector equality duty:

Latest information and updates to the Equality Act 2010 from the UK government, including quick start guides:
www.homeoffice.gov.uk/equalities

Latest information on equality from the Scottish government:
www.scotland.gov.uk/Topics/People/Equality

Scottish government equality evidence finder:
www.scotland.gov.uk/Topics/People/Equality/Equalities/DataGrid
## Specific duties: timeline for publishing

<table>
<thead>
<tr>
<th>Date</th>
<th>Colleges and HEIs must publish:</th>
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<tbody>
<tr>
<td><strong>By 30 April 2017</strong></td>
<td>- A report on progress made in mainstreaming the general duty since 2015, which includes:</td>
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<tr>
<td></td>
<td>- employee information if not published elsewhere</td>
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<td></td>
<td>- board diversity information</td>
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<tr>
<td></td>
<td>- A report on final progress in delivering the institution’s set equality outcomes for 2013–2017</td>
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<td></td>
<td>- A new set of equality outcomes for 2017–2021</td>
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<tr>
<td></td>
<td>- Gender pay gap information</td>
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<tr>
<td></td>
<td>- For institutions with 150 or more staff, a statement on equal pay and occupational segregation relating to gender, disability and race</td>
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<td><strong>By 30 April 2019</strong></td>
<td>- A report on progress made in mainstreaming the general duty since 2017, which includes:</td>
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<td>- board diversity information</td>
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<tr>
<td></td>
<td>- A report on progress made towards achieving the set of equality outcomes for 2017–2021</td>
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<tr>
<td></td>
<td>- Gender pay gap information</td>
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<tr>
<td><strong>By 30 April 2021</strong></td>
<td>- A report on progress made in mainstreaming the general duty since 2017, which includes:</td>
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<td>- A new set of equality outcomes for 2021–2024</td>
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<tr>
<td></td>
<td>- A statement on equal pay and occupational segregation for gender, race and disability (all institutions with 20 or more staff)</td>
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</tbody>
</table>
Equality Challenge Unit (ECU) supports higher education institutions across the UK and in colleges in Scotland to advance equality and diversity for staff and students.

ECU provides research, information and guidance, training, events and Equality Charters that drive forward change and transform organisational culture in teaching, learning, research and knowledge exchange. We have over ten years’ experience of supporting institutions to remove barriers to progression and success for all staff and students.

ECU believes that the benefits of equality and diversity and inclusive practice are key to the wellbeing and success of individuals, the institution’s community, the efficiency and excellence of institutions, and the growth of further and higher education in a global environment.

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