

HEFCW Draft Strategic Equality Plan

March 2020 – April 2024

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Noddir gan
Lywodraeth Cymru
Sponsored by
Welsh Government

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

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

While we do not have powers to set equality objectives for individual HE providers, we take account of their objectives and the impact they have on compliance with our equality duties in setting, and making progress towards meeting, our equality objectives. We do not have powers to set objectives for individual HE providers.

There are many benefits to improving equality and diversity in higher education and ensuring inclusive approaches. These benefits go beyond higher education and HEFCW, as they contribute to social justice, civic engagement and making Wales a fairer place to live, work and study. We have a long-term commitment to champion equality of opportunity and promote effective and inclusive practices in higher education.

Higher education providers have diverse populations of staff, applicants and students. We work in partnership and collaborate with them, and involve their staff and students, to secure equality of opportunity. We promote preventative approaches to achieve continuous improvement and we challenge, with evidence and advice, to tackle entrenched inequality.

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

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

HEFCW's strategic vision:

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

Sustainable, accessible, internationally excellent higher education in Wales

Our Strategic Equality Plan (SEP) contributes to achieving this vision its four high-level equality and diversity objectives are aligned with our corporate objective themes¹.

Our four high-level equality objectives are:

We fund:

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

We regulate:

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

We collaborate:

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

We operate effectively:

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

In developing this plan we have taken account of the Welsh Government's draft Strategic Equality Plan short and long-term aims and objectives. The Welsh Government is consulting on the enactment of a socio-economic duty under the Equality Act. While HEFCW and higher education may not have this duty upon them, we will take account of socio-economic factors in our ways of working.

We have considered the implications of the [Wellbeing of Future Generation \(Wales\) Act 2015](#), wellbeing goals, the ways of working and the sustainable development principle.

We have published and will continue to review [HEFCW's Well-being Statement](#), which has informed this Strategic Equality Plan.

We have collaborated with other Welsh Public Bodies² to ensure an integrated and coordinated approach to positively challenge and address entrenched inequality that persists across the public sector in Wales.

We have set out our priorities for action under each of the four Strategic Equality Plan objectives detailed above, to ensure equality and diversity is embedded in all that we do.

¹ HEFCW's mission is to: fund higher education in Wales; regulate higher education providers in Wales; influence higher education with evidence-based advice and strong partnership working; work in partnership with students; and operate effectively as an organisation.

² National Public Bodies Group membership: Natural Resources Wales, Arts Council of Wales, National Museum Wales, HEFCW, Welsh Language Commissioner, Careers Wales, Welsh Revenue Authority, HEIW, Sport Wales, Cardiff and Vale University Health Board and Velindre University NHS Trust.

Objective 1:

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

Short term priorities

We will:

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

Objective 2:

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

Short term priorities

We will:

- Approve or otherwise fee and access plans submitted to us to secure equality of opportunity and the promotion of higher education. *(throughout the strategy period)*
- Evaluate fee and access plan activities and services to identify and promote the most effective ways of securing equality of opportunity and equity of outcomes. *(throughout the strategy period)*
- Intervene to secure compliance, where appropriate, in line with our statutory duties for regulation, including under [Prevent](#) and the [Higher Education \(Wales\) Act 2015 legislation](#). *(throughout the strategy period)*
- Use our annual assurance processes³, to improve performance in equality and diversity, including through:
 - Institutional Risk Review;
 - Institutional Assurance Review Visits; and
 - Annual Assurance Returns. *(throughout the strategy period)*
- Review higher education providers' strategic equality plans and related data to inform our risk assessment and assurance processes, our own strategic equality objectives and to challenge performance in this area. *(throughout the strategy period)*

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

Objective 3:

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

Short term priorities

We will

- Work with higher education providers to secure action on addressing pay gaps⁴ *(throughout the strategy period)*
- Challenge higher education providers on student attainment gaps⁵ and actions to improve differential attainment⁶. *(by 2021)*
- Support higher education providers in their response to relevant research and publications including from [Welsh Government](#), the [Equality and Human Rights Commission](#), [Universities UK](#), [Advance HE](#) and others. *(throughout the strategy period)*
- Work with partners to develop and implement [HEFCW's Policy Statement on Well-being and Health in HE](#), including the development of underpinning co-created action plans for staff and students. *(throughout the strategy period)*
- Promote and share effective practice in equality and diversity for staff and students in higher education. *(throughout the strategy period)*
- Promote the values of the [Researcher Development Concordat](#), encouraging universities in Wales to become signatories of the Concordat and for them to create action plans that will embed the principles of supported careers across the sector. *(throughout the strategy period)*
- Review well-being and health strategies) and monitor progress. *(throughout the strategy period)*
- Audit and publish guidance and effective practice on supporting refugees and asylum seekers in higher education, including as this relates to HE staff and students. *(by 2020)*
- Publish guidance and good practice case studies on tackling violence against women, domestic abuse and sexual violence (VAWDASV) and review and monitor progress. *(throughout the strategy period)*

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

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

6 Across protected characteristics and socio-economic areas

- Work with Welsh Government, Universities UK, Advance HE and other partners to contribute to their strategies and plans and progress our commitments to equality and diversity, including tackle VAWDASV. *(throughout the strategy period)*
- Monitor and challenge higher education providers on gender equality and participation in Science, Technology, Engineering and Mathematics (STEM) and other subjects where there are known gender inequalities.⁷ *(by 2022)*
- Work with the Welsh Government and partners on the review and implementation of a revised [Public Sector Equality Duty](#) (PSED). *(throughout the strategy period)*
- Challenge and support institutions on the diversity of their governing body. *(throughout the strategy period)*

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⁷ HESA trend data

Objective 4:

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

In developing Objective 4, HEFCW has worked collaboratively with the Welsh National Public Bodies Equality Group⁸ to establish joint priorities that align with the Welsh Government's draft long-term aims for Wales. Additionally, there are also HEFCW-specific objectives.

* Welsh Government's draft Strategic Equality Plan priorities

** Welsh Public Bodies' draft Strategic Equality Plan priorities

Short-term priorities

We will:

- Ensure HEFCW is fully compliant with the Equality Act and the Public Sector Equality Duty. *(throughout the strategy period)*
- Minimise pay gaps, we will ensure accurate data across the public sector that enables analysis (across protected characteristics)* and publish action plans to address any pay gaps identified. *(throughout the strategy period)*
- Progress HEFCW remit letter requirements that relate to equality and diversity, including well-being and health, including mental health. *(throughout the strategy period)*
- Increase workforce diversity, we will have aligned our own employment data reporting to match that of the Welsh Government in both format and reporting dates (By 2022) * and by 2024 we will have evidence of how we reach out to minority groups and those living in poverty to gain employment with us*. *(throughout the strategy period)*
- Obtain evidence through equalities monitoring data that our community engagement is representative of the National 2021 population census of Wales*. *(throughout the strategy period)*
- Ensure that procurement data is in place and will evidence diversity of procurement*. *(throughout the strategy period)*
- Develop HEFCW's action plan to embed some of the core principles of the Researcher Development Concordat, including increasing engagement with early career researchers and supporting training for researchers throughout their career. *(throughout the strategy period)*

⁸ National Public Bodies Group membership: Natural Resources Wales, Arts Council of Wales, National Museum Wales, HEFCW, Welsh Language Commissioner, Careers Wales, Welsh Revenue Authority, HEIW, Sport Wales, Cardiff and Vale University Health Board and Velindre University NHS Trust.

- Evidence operational systems and ways of working that ensure individual needs are understood and respected whilst accessing and receiving services**. *(throughout the strategy period)*
- Contribute to the development of the [Commission for Tertiary Education and Research](#), including as it relates to equality and diversity. *(throughout the strategy period)*
- Review the HEFCW Well-being Statement and objectives*(throughout the strategy period)*
- Implement the HEFCW-related recommendations in the Equality and Human Rights Commission's report: [Tackling Racial Harassment: Universities Challenged](#).

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In developing our short-term outcomes, medium-term milestones and long-term ambitions we have worked collaboratively with the Welsh National Public Bodies Equality Group⁹ to establish joint priorities that align with the Welsh Government’s long-term aims for Wales as set out in its draft Strategic Equality Plan.

* Welsh Government’s draft Strategic Equality Plan priorities
 ** Welsh Public Bodies’ draft Strategic Equality Plan priorities

Short-term outcomes	Medium term milestones	Long term ambitions
<p>by the end of the Strategic Equality Plan we will:</p> <ul style="list-style-type: none"> • Develop systems to engage communities and to ensure service delivery reflect individual need** • Improve the evidence-base to support enhanced monitoring and challenge. • Align our own employment data reporting to match that of the Welsh Government in both format and reporting dates** • Work collaboratively to increase the diversity of the student and staff populations (to include HEFCW, Governing Bodies’ membership and higher education providers’ staff) • Ensure accurate data across the public sector that provides analysis. (across protected characteristics)** • Improve procurement data will that will evidence diversity of procurement** 	<p>by 2025 we will:</p> <ul style="list-style-type: none"> • Evidence, through equalities monitoring data, that our community engagement is representative of the National 2021 population census of Wales** • Evidence operational systems and ways of working that ensure individual needs are understood and respected whilst accessing and receiving services** • Ensure shared learning of best practice is actively influencing delivery services to meet individual needs** • Improve retention, learning outcomes and success for groups with protected characteristics • Improve reporting and increase support for identity-based abuse, harassment, hate crime and bullying. • Evidence how we reach out to people with protected characteristics and from under-represented socio-economic 	<p>in 15+ years, we will:</p> <ul style="list-style-type: none"> • Contribute to fulfilling HEFCW Corporates Strategy vision for ‘sustainable, accessible, internationally excellent higher education in Wales’. • Contribute to ensuring that ‘the needs and rights of people who share protected characteristics are at the forefront of the design and delivery of all public services in Wales’.* • Contribute to ensuring that ‘approaches to actively engage with the diverse communities of Wales are in place, involving individuals that make up our communities in the decisions that we make together.’** • Contribute to ensuring that ‘Wales is a world leader for gender equality’.* • Contribute to ensuring the ‘elimination of identity-based abuse, harassment, hate crime and bullying’.

⁹ National Public Bodies Group membership: Natural Resources Wales, Arts Council of Wales, National Museum Wales, HEFCW, Welsh Language Commissioner, Careers Wales, Welsh Revenue Authority, HEIW, Sport Wales, Cardiff and Vale University Health Board and Velindre University NHS Trust.

	<p>groups to raise the profile of employment with us**</p> <ul style="list-style-type: none">• Ensure that disclosure of information is part of organisational culture, staff understand why data is collected, ensuring that necessary data is only collated (GDPR)**• Ensure shared procurement principles are operational and evidenced**	<ul style="list-style-type: none">• Contribute to ensuring that ‘the Welsh public sector leads the way as exemplar inclusive and diverse organisations and employers’.*• Contribute to ensuring that ‘Our organisations will reflect a fair and inclusive environment, where all employees feel valued and can have the same opportunities to fulfil their potential within the organisation’.**• Ensure that procurement drives equality.
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The following data sources which we will use to monitor progress are indicative, rather than in exhaustive.

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

Legislative and policy context

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

The [Equality Act 2010](#) (the Act) and the Public Sector Equality Duty (PSED).

The Equality Act (October 2010) places a duty on public sector bodies such as HEFCW. In the exercise of its functions, a public body must have due regard to the need to:

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

The general duty covers nine protected characteristics.¹⁰

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

The aim of the Public Sector Equality Duty (PSED) is to ensure that public bodies and those carrying out a public function consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities. The

¹⁰ Age, Disability, Gender reassignment, Pregnancy and maternity, Marriage and civil partnership (in respect of the requirement to have due regard to the need to eliminate discrimination), Race, Religion and belief, Sex and Sexual orientation.

duty ensures that equality considerations are built into the design of policies and the delivery of services and that they are kept under review to achieve better outcomes for all.

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

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

In developing the 2020 -20214 SEP, HEFCW has considered the implications of the Act's wellbeing goals, ways of working and the sustainable development principle.

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

Policy considerations

- The Strategic Equality plan (SEP) has been informed by the following policy considerations:
- Equality and Human Rights Commission [Is Wales Fairer? 2018 \(2018\)](#)
- Welsh Government [Well-being of Wales 2017-18 \(2018\)](#)
- Equality and Human Rights Commission [Freedom of expression guide for higher education providers and students' unions in England and Wales \(2018\)](#)
- Welsh Government [Nation of Sanctuary – Refugee and Asylum Seeker Plan \(2019\)](#)
- Equality and Human Rights Commission [Tackling racial harassment: Universities challenged \(2019\)](#)
- [HEFCW's Well-being and Health in Higher Education Policy Statement \(2019\)](#)
- HEFCW Corporate Strategy 2016 -2020
- HEFCW remit letter consideration that relate to equality and diversity.

Horizon scanning

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

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

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

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