

September 2004

Review of progress in race equality

Overview report to HEFCE by OPM



OPM, 252B Gray's Inn Road, London WC1X 8XG
tel: 020 7239 7800
fax: 020 7837 5800
email: office@opm.co.uk
web: www.opm.co.uk

OPM is a registered trademark of the Office for Public Management Ltd

Contents

Introduction	1
Section 1: Overview	4
1.1 Indicators of impressive progress	4
1.2 Key themes	4
Section 2: Detailed findings	8
2.1 Understanding of context and issues	8
2.1.1 Overall commitment and approach to race equality	8
2.1.2 Understanding of context	9
2.1.3 Vision and objectives	10
2.2 Appropriate structures and processes	12
2.2.1 Structures	12
2.2.2 Training and awareness raising	13
2.2.3 Consultation and engagement	13
2.2.4 Partnership work and contracting	14
2.2.5 Complaint and grievance procedures	15
2.2.6 Accessibility and awareness	15
2.3 Appropriate planning and target setting	16
2.3.1 Monitoring data	16
2.3.2 Target setting	17
2.3.3. Mainstreaming	18
2.3.4 Action plan	19
2.4 Learning from and reviewing policies and plans	19
2.4.1 Evidence of learning, impact assessment and review	19
2.4.2 Sharing good practice	20
2.5 Leadership and commitment	21
2.5.1 Visible support and commitment at senior levels	21
2.5.2 Reporting	21
2.5.3 Resources	21
2.5.4 Holding people to account	22
Section 3: Conclusions and recommendations	23
3.1 Recommendations	23

Introduction

The general and specific duties of the Act

The Race Relations (Amendment) Act (2000) (RRAA) places a general duty on public authorities, including higher education institutions (HEIs), to promote race equality. Under the duty, public authorities undertaking all relevant functions, including HEIs in England and Wales, are required to have due regard to:

- eliminating unlawful racial discrimination,
- promoting equality of opportunity, and
- promoting good relations between people of different racial groups.

As well as the general duty, the Act imposes specific duties on HEIs to assess the impact of all their policies on students and staff of different groups. In particular, each institution is required to:

- monitor the applications, admissions and progression of students
- monitor the career progression of staff
- publish its race equality policy
- take reasonable steps to publish the results of monitoring, assessment and review.

The review process to date

Under the RRAA, HEIs were required to have race equality policies and action plans in place by 31 May 2002. As a first stage in fulfilling its legal obligations under the RRAA, the Higher Education Funding Council for England (HEFCE) requested that all institutions submit race equality policies and action plans in November 2002. On HEFCE's behalf, the Equality Challenge Unit (ECU) commissioned a review of HEIs' policies and action plans. This review found that a significant number of HEIs fell short of meeting the requirements of the RRAA and needed to do further work on their policies and plans.

In May 2003, the ECU commissioned OPM to undertake a re-evaluation of the quality and level of statutory compliance of the race equality policies and action plans of 45 HEIs. Policies and plans were only submitted for re-assessment if they were assessed in the first round as 'developing appropriately but with major work remaining to be done' or as 'not yet aligned with the requirements of the RRAA'. An overall report was published at this stage, identifying the areas of good and weaker practice across these particular HEIs. Recommendations about ways in which the ECU and HEFCE could further support the sector were also provided. At this stage, the policies and plans of 17 HEIs were assessed as still not meeting the requirements of the RRAA.

Review of progress

Two years after the original deadline for submission of race equality schemes and action plans, HEFCE and the ECU are interested in learning about how HEIs have implemented race equality

within their institutions, and the outcomes that have been achieved. The ECU commissioned OPM to review the progress made in a random sample of 55 HEIs. In addition, 15 institutions assessed in May 2003 as not yet compliant with the requirements of the RRAA were included in the review of progress. The policies and plans of these 15 institutions were assessed a third time for compliance with the Act.

This report sets out the findings of this review of progress. It identifies examples of good practice from which other institutions can learn, and highlights areas of weakness and ways in which the ECU might promote further progress. While we have highlighted a number of examples of good practice, we recognise that many other HEIs might be involved in or planning similarly positive activities. Nevertheless, such examples serve as a useful starting point to indicate areas in which HEIs are beginning to take proactive and positive steps to further the race equality agenda. The report aims to provide a baseline against which further progress can be measured, and to allow HEIs to learn from one another's experience.

Methodology

In reviewing HEIs' progress, OPM considered the following five broad categories:

1. The extent to which HEIs demonstrate an understanding of the context in which their own race equality agenda operates, and their responsiveness to this.
2. The appropriateness of structures and processes for ensuring race equality across all functions of the institution.
3. The appropriateness of planning and target-setting in relation to race equality issues.
4. The extent to which HEIs have adequate procedures for review and demonstrate active learning and appropriate revision based on experience.
5. Evidence of leadership and commitment in relation to race equality.

This was a desk-based exercise: we relied entirely on the submissions of the HEIs for our information. The documents submitted varied across HEIs, but generally included race equality policies and action plans, monitoring data and annual progress reports. In several cases, staff handbooks or student prospectuses and similar materials were also submitted.

The paper-based approach has some limitations, in that one cannot always be certain that laudable policies translate into effective action. It is also difficult to provide a standard measure of progress across such a broad range of HEIs, given their very different starting points, as well as the different contexts in which they operate and the challenges they face. Therefore this should not be viewed as a 'rating' exercise. While we have indicated, for example, where we found institutions to be making impressive progress, or suggested that progress was limited, these assessments were made in respect of what we knew of the institution from previous policies, plans and assessments, as well as from the documents submitted for review. At no stage were institutions compared with one another.

Headline findings

Three institutions chose not to submit reports at this time, while another noted that due to particular circumstances it had no significant progress to demonstrate. The review report therefore covers the progress of 66 institutions. Of these, two-thirds were progressing reasonably or positively. About 13 per cent could be said to be making impressive progress, while around 20 per cent were, for various reasons, more limited in their progress.

Section 1: Overview

1.1 Indicators of impressive progress

Those HEIs that have demonstrated impressive progress at this stage show a number of common characteristics.

- They show a strong understanding of the institutional context and the particular challenges and opportunities this presents in terms of pursuing race equality. The promotion of race equality is clearly linked to the institution's mission and values.
- They have taken proactive steps to promote race equality across all areas of their activities, committing significant resources and staff time. Monitoring arrangements are well embedded, and cover the range of activities from application through to leaving.
- Accountability is clearly defined. Race equality objectives are incorporated in job specifications and performance appraisals, as appropriate. Reporting arrangements are clear and regular and provide effective links with senior management and governors.
- Comprehensive training arrangements are in place, covering all staff. Students and governors also receive appropriate awareness-raising training. Briefing on the race equality policy and relevant codes is integral to student and staff inductions.
- Consultation and engagement activities incorporate all levels of staff as well as students, and extend beyond committee structures or forums. They incorporate a range of mechanisms, and may also include specific mechanisms for engaging with ethnic minority groups. Feedback is actively encouraged through various channels, and reaches the top of the organisation in a constructive way. Links with local communities are strong. Community groups, the local Race Equality Council, ethnic minority businesses, and religious leaders are called upon for external advice.
- Regular review appears to be an effective means of encouraging progress. In some cases, HEIs that were recognised as examples of good practice in the first rounds of review have been less inclined to revise and update their policies, and as a result progress is less visible, despite what may be taking place on the ground.

1.2 Key themes

An assessment of HEIs' compliance with the RRAA in mid-2003, based on their race equality policies and action plans, identified a number of areas for improvement. This section provides an overview of these areas, and identifies progress made over the past year.

Understanding the institutional context

The review found that the context in which the institutions are working, in particular their local demographic profile or the specialised nature of courses offered, affects their progress.

Institutions in areas with larger black and ethnic minority populations tend to have made better progress than those in areas with low black and minority ethnic demographic profiles. While this may

not seem surprising, it indicates that some HEIs in predominantly white areas are struggling to develop effective ways of attracting staff and/or student candidates from beyond their local communities. However, a significant number of such institutions are trying new and innovative methods, with positive results, such as targeted advertising in ethnic minority media, recruitment drives in more diverse areas within the region, reviews of recruitment and selection procedures, and commissioned research into the causes of low ethnic minority recruitment.

Small and/or specialist HEIs are still struggling to increase the participation of black and minority ethnic staff and students. Again, there are examples of good practice in this area, with proactive efforts to break down stereotypes associated with particular courses and to broaden the range of courses offered within the specialised area. There may be some scope for institutions to learn from one another.

Race and the wider equalities/diversity agenda

The previous assessment raised some concerns about HEIs that are dealing with race equality as one strand of a broader equalities/diversity agenda. This is a legitimate approach and can provide a useful means of mainstreaming efforts. However, the RRAA sets out very exact legal requirements in terms of race equality. While the specific duties can be used as enablers in other areas of the equalities agenda, it is essential that race equality duties are fully met. By including race within a broader agenda, several HEIs had lost their focus on these duties, and risked being in breach of the Act. In addition, particularly in HEIs with very small black and ethnic minority student or staff populations, there was a risk of race slipping down the agenda.

This review of progress indicates that there is a greatly improved focus on race equality; this is evident, for example, in the large number of HEIs who have dedicated staff time to establishing steering groups responsible for overseeing race equality, and the appointment of departmental champions with responsibility for raising awareness and bringing equality into the mainstream.

Given the range of diversity-related legislation coming into force over the past few years, it is understandable that a significant proportion of HEIs continue to pursue race equality as one of several strands. Such an approach requires careful resource allocation, to ensure that particular aspects of the agenda are not neglected. It also requires firm leadership and commitment from senior levels to ensuring that race equality is recognised as a key strand of the equalities agenda. Several HEIs have produced very effective diversity toolkits, training materials and/or websites. However, this review has found that mainstreaming race equality, appropriate accountability arrangements, and firm, visible leadership remain areas in which a large number of HEIs still need to improve.

Links between policies and plans

The previous assessment found that the links between policies and action plans were in many cases not strong enough to facilitate clear implementation of race equality objectives. Many HEIs failed to make appropriate links between the overall aims and objectives stated in their policy documents and

the specific actions contained in their action plans. Most HEIs have made progress in this regard, and action plans have tended to be more detailed and comprehensive.

However, synergy between race equality policies and action plans could still be improved in many cases. In particular, the importance of keeping both documents 'live' and dynamic has not been sufficiently recognised. Where action plans reflect considerable changes in structures or systems, for example, policies have not always been updated to reflect this. In other cases, HEIs have been slow to update their action plans as new initiatives have been rolled out, with the result that evidence of progress to date has to be sought in minutes of meetings or annual reports. These policies and plans are crucial public documents, against which internal and external stakeholders will judge an HEI's approach to race equality. It is essential that the policy remains current and that the action plan is regularly updated, at least annually, to indicate progress and new challenges.

Monitoring and data

In the previous round of assessment, a number of HEIs still appeared to be in the early stages of collecting and monitoring baseline data, despite statutory requirements to do so. While the number of institutions in this situation is now much reduced, a significant proportion are only just beginning to establish comprehensive monitoring systems across the full range of student and staff activities. Most HEIs now have a baseline against which to judge progress, but this is not always appropriately detailed. It tends to be the institutions considered to be progressing well in other areas that assess progress across different grades and types of staff, or students in different departments, for example. Many HEIs have not reached this level of analysis. It is difficult to see the value of monitoring statistics if they give only broad generalisations about the staff or student body as a whole.

A lack of attention to students and a tendency to focus more on staff matters was raised as an issue in the previous assessment. This remains problematic across a number of HEIs, although the situation has improved overall. Monitoring information for staff is in several cases much more advanced than that for students, and while a considerable number of HEIs still do not have targets in place for recruiting black and ethnic minority staff, a lack of robust strategies to address student diversity is fairly widespread.

This lack of sophistication in monitoring data is reflected in a lack of clear specific targets in a great many HEIs. Only a few institutions have established numerical targets in respect of staff and, less often, students. In the best cases, these targets are clearly explained in terms of the current staff/student profile, shifts in this profile over the year, the demography of the local area and the wider pool from which the institution may recruit, and the particular challenges the institution envisages in meeting such targets. They are also broken down by department/grade, etc. Such examples of good practice are, however, few in number.

Defining success

We suggest that this slow progress on target setting by many HEIs is linked to another issue identified in the previous round of assessment: HEIs' apparent difficulty in defining success criteria in relation to their race equality objectives. Many HEIs seem to have some difficulty in translating policies and

plans into anticipated tangible outcomes that will make a difference to the way institutions look and operate in the future.

Communication

The previous assessment highlighted the lack of accessibility of many race equality policies and plans. These documents are supposed to be practical, comprehensible and accessible to all. The extent to which HEIs have achieved this objective is still variable. Most of the documents reviewed were accessible and user-friendly, and some institutions have taken proactive steps to improve accessibility further. One is considering translating policy documents into community languages, for example; while others have published policy summaries in leaflet or A5 format. However, in a small number of institutions, the use of inappropriate words and a questionable tone remains a cause for concern.

The quantity of information is also an issue in several HEIs. One HEI, clearly doing a great deal of good work, had an action plan that ran to 30 pages. Rather than being updated over time, it was supplemented by an equally long progress report. The reader therefore had to digest 60 pages of text in order to develop a sense of what the institution has achieved, which may inhibit accessibility and accountability.

Partnerships and contractors

A general area for improvement highlighted in the previous assessment was the need for more attention to race equality objectives in partnerships and contracted work. This is an area in which most HEIs now show a significant improvement, and active measures are being taken. A large proportion of HEIs have taken steps to publicise and communicate their policies and to embed race equality objectives in their tendering and procurement arrangements. A particularly effective example includes the development of a summary of a partner's obligations under the RRAA, which the agency must sign in order to proceed with the tendering process. Many HEIs now also require agencies to supply their own equality/race equality policies with their tender documents.

Section 2: Detailed findings

The following section provides an overview of the progress made in relation to race equality issues in five areas:

- understanding of context and issues
- appropriate structures and processes
- appropriate planning and target setting
- learning from and reviewing policies and plans
- leadership and commitment.

It highlights examples of good practice, identifies areas of strength demonstrated by HEIs, and indicates areas that are proving challenging or problematic.

2.1 Understanding of context and issues

2.1.1 Overall commitment and approach to race equality

Most HEIs appear to have a thorough grasp of the nature and range of issues that need to be considered in promoting race equality. Not all HEIs achieve a strongly positive and proactive tone in these policies, however. Some policies convey a sense of real commitment and dynamism; but the documents of significant numbers of HEIs remain rather dry and functional, with a sense of being focused on meeting the requirements of the law, rather than actively promoting the positive benefits of greater diversity. In a small number of cases, the tone is quite problematic, with long lead-ins explaining why diversity is such a difficult issue for the institution.

In some cases, inappropriate use of language undermines the policy document. Some five institutions continue to classify ethnic minorities as 'non-white', for example. 'Black and ethnic minority' or 'black and minority ethnic' are generally accepted terms and reflect the language used by bodies such as the Commission for Racial Equality (CRE). Describing a group of people in terms of what they are not, should be avoided.

Most HEIs have made good progress in focusing on race equality as a key issue in its own right, rather than subsuming it as one of many branches of a wider diversity or equal opportunities agenda. The latter approach can be made to work effectively, so long as there are clear structures, strong leadership and adequate resources in place to ensure that each strand receives the detailed attention it needs. However, there are still a small number of HEIs that risk paying insufficient attention to race equality issues, focusing on broader questions such as social inclusion and widening participation without getting to grips with specific issues concerning ethnic minority students and staff.

In a several cases, positive efforts are being made to allocate resources to ensure that institutions are welcoming to and inclusive of people from a wide variety of backgrounds. Examples include the

provision of different types of food, provision of policy documents and/or admissions literature in a range of languages, 24 hour telephone helplines for students, and a review of student housing to accommodate the needs of international students. A number of HEIs are also engaging in positive activities in relation to the celebration of events that emphasise diversity.

At St Martin's College, the Business and Community Enterprise Unit produced 'Beyond Face Value' in December 2003. This well-written, easily accessible handbook for employers and trainers explores the needs of Muslim employees and students.

At Liverpool Hope University College, the Registrar and Secretary's Office, together with the Centre for English Language, laid a complaint with the local bus organisations and schools about racist language used by local pupils against international students travelling to the college. Thanks to the college's intervention, these incidents were stopped.

2.1.2 Understanding of context

Most HEIs effectively explain the purpose of their race equality policies in terms of their legal obligations under the general and specific duties created by the RRAA. But only a small minority effectively articulate the particular context in which the HEI is operating, and clearly identify the priorities, opportunities and challenges in terms of local context.

Many race equality policies would benefit from a section providing some details of the ethnic profile of the local area, together with the current ethnic profile of students and members of staff at the institution. It would also be appropriate to include some detail about the specific challenges the institution faces in relation to widening participation among black and minority ethnic members of staff and students. This would help to provide a stronger sense of the aspirations of HEIs in relation to race equality.

Where this is done well, there is a clear sense of the demographics of the local area, as well as the demographics of the wider pool of potential students and staff. Thus, for example, an institution in a predominantly white area, while acknowledging the challenge of recruiting a diverse staff base, nonetheless refers to other towns in the region where diversity is more evident and the strategies it is using to recruit in these areas. Similarly, an institution based in London analyses its student monitoring data at a detailed level, using the 2001 census data, ensuring that any issues specific to particular ethnic groups can be clearly identified. Consideration of demographic context should also take into account international students, recognising issues relevant to accessibility, language, culture etc.

Consideration of context includes the nature of the institution itself, such as its size and the type of courses offered. As noted above, in several cases small and specialised institutions have particular difficulties attracting ethnically diverse students and staff. Where institutions have experienced these problems, they have tended to refer to difficulties associated with offering a specialised course, for example, or with attracting ethnic minorities to a specific mode of working, such as distance learning.

Efforts to break down perceived stereotypes and open up these fields of study to a wider student group are beginning. Many institutions, particularly those with a focus on the arts, report difficulties recruiting suitably qualified senior staff from ethnic minority groups, and suggest that the availability of such individuals will take time to improve. It might be useful for future research to look more closely at this issue, and the extent to which perceptions match reality.

The University of Derby provides specific support for international students through its recruitment and enrolment team, which provides orientation and integration support, immigration and English language advice and general signposting.

At St Martin's College a useful guide has been produced on good assessment practice for all staff involved in teaching and supporting learning. The guide includes sections on assessing students from diverse backgrounds.

At the University of Leeds, the Department of Education makes good links with projects and other organisations in supporting access to, and progress in, training and education among people from black and minority ethnic communities.

The University of Exeter SELL project has been very successful in aiding the recruitment and retention of black and minority ethnic student teachers. Withdrawal rates among these students have been reduced to zero.

2.1.3 Vision and objectives

The review suggests that, in many HEIs, race equality issues are not yet embedded as part of a long-term vision. Many HEIs still find it difficult to articulate what they are trying to achieve, and to formulate a clear idea of what success would look like for them in their particular context.

There were relatively few examples of HEIs that had clearly linked their race equality objectives into corporate objectives and mission statements. Where this has been achieved, it creates a strong sense of commitment to race equality and demonstrates an understanding of the need to tackle the agenda at the corporate level. While a large number of HEIs note that greater diversity will benefit students and staff, far fewer provide any detail about what these benefits will be. To state that there is a business case is a step in the right direction. To articulate this for staff, students and other stakeholders reading the policy helps to get people behind the objectives and convince them of the benefits. Gaps in this area may be linked to a lack of confidence among many HEIs, in terms of actively challenging existing views and ways of working. There is also a tendency for policies to translate into very process-based plans, which fail to demonstrate intended outcomes clearly.

Weakness in articulating a vision is linked to the absence of clearly defined and appropriate targets. The reason for this apparent reluctance to set targets varies. In some cases, HEIs have appropriate proportions of ethnic minority students and staff, and may feel justified in merely keeping these more or less constant. More frequently, it is HEIs with a gap to close that fail to set targets. Some argue

that the numbers are too small to be meaningful, while others suggest that, in their context, targets would amount to quotas or would require positive discrimination. We recognise the reluctance of HEIs to be held to account for targets that may be difficult to attain. Staff targets are nonetheless a requirement of HEFCE funding, and we would argue that staff and student targets are an important means of making a firm commitment and showing what success will look like. Many race equality policies could be strengthened by including a discussion in the opening section on vision and aims, supported by key headline targets and an explanation of why these are relevant and important.

The University of Bradford works with Bradford College to create a shared vision in relation to race equality issues. These two HEIs hope to serve as a model for the development of community relationships for the whole area.

The University of East London race equality policy includes a strong vision statement, indicating a shared vision within the university, and a clear purpose for the race equality policy within this vision.

Birkbeck College's corporate advertising campaign demonstrates the diversity of the institution's students. Campaign materials are widely distributed, including on the London Underground. Anecdotal evidence indicates that the campaign is successful in attracting a wide range of students from different ethnic groups. A high proportion of black and minority ethnic people attend Open Evenings. Open Evening campaign advertisements are placed in the Guardian, Evening Standard and Metro, with radio advertisements on LBC, Jazz FM and News Direct. Birkbeck has found that this mass-level targeting of publicity is significantly more successful than targeting the black and minority ethnic media specifically.

2.2 Appropriate structures and processes

2.2.1 Structures

Structures to meet race equality responsibilities vary widely among institutions. Most HEIs have established steering groups, although these vary from groups focused specifically on race equality to groups dealing with equality issues more broadly, or, in some cases, groups tasked with staff or student matters. The level of senior representation on these groups and how inclusive they are is very important. In the best examples, steering groups comprise a good cross-section of staff, including senior management, academic and administrative staff and trade unions, and include some student representation. In some cases, external representatives, such as local race equality council members, also sit on this group.

It is not always apparent how diverse the steering group itself is. While some HEIs specify that black and ethnic minority students and staff are represented, this is not always the case, which could undermine the extent to which the group has a clear and direct understanding of important issues. It is also crucial for the steering group to be appropriately linked to the institution's reporting and decision-making structures. This has been achieved in a good number of HEIs, with the Vice-Chancellor or Principal sitting as chair of the group.

Some HEIs have dedicated resources to employ members of staff with specific responsibility for race equality, equal opportunities and/or diversity. This seems to work well, particularly where HEIs have required major reworking of their policies or plans, for example. Such appointments have also helped to ensure that there are strong systems for staff and students to feed back views to senior levels.

Many HEIs have nominated specific 'champions' for race equality at service area or faculty level. Representation at departmental level appears to work particularly well in ensuring that race equality objectives are pursued. This seems to be a good way of raising awareness of race equality objectives, disseminating information about developments relating to the race equality policy and plan, and feeding back the issues and concerns of students, staff and the wider community to senior levels. Such individuals, with appropriate training, can provide a valuable resource to assist HEIs in their mainstreaming efforts. It seems that the role of champions works less well if there is no dedicated support at higher level.

At the London School of Economics, individual departments must produce departmental level race equality action plans. The Race Equality Working Group provides detailed guidance to help them do this. All departments must monitor their progress annually.

Goldsmiths College has equal opportunity facilitators in all departments – both academic and support. These facilitators play a central role in disseminating good practice and encouraging the promotion of equalities within the college.

The University of Leeds provides detailed information of the range of activities it undertakes to widen

participation, including foundation programmes to facilitate access routes for black and minority ethnic students. It also holds 'taster' events and programmes that are offered to schools and colleges to encourage a more diverse student cohort.

South Bank University has appointed a staff member with responsibility for outreach.

2.2.2 Training and awareness raising

All HEIs' policies and plans refer to some form of race equality, diversity or equal opportunities training, but the particular arrangements vary widely. In many cases, arrangements for staff training appear patchy, with only certain members of staff targeted, such as those sitting on interview panels, or new staff undergoing induction. Training arrangements often focus mainly on staff, while provision for awareness raising among students tends to be limited to induction sessions. Work remains to be done in several HEIs to ensure that training arrangements are included as a clear section in race equality policies.

At the University of Derby, admissions tutors have regular meetings to discuss good practice in relation to race equality issues.

The University of Leeds has developed a robust training strategy, and its action plan indicates clear progress. The three-year staff development plan includes specific training on race equality for all staff groups. Information is further disseminated through lunchtime briefings, a leadership development programme and an 'Institutional Racism Toolkit'.

The University of Portsmouth is implementing a computer-based equality training programme, accessible to all staff and students from October 2004. Kingston University plans to develop on-line diversity and equality training.

University College Winchester plans to set up an intranet chat room to discuss and debate race-relevant issues.

At the University of Westminster a 'Respect for People' diversity learning programme has been launched for all members of staff, including senior management and the governing body. Lord Herman Ouseley, the former Chair of the Commission for Racial Equality, launched the programme. The university also publishes a comprehensive and easy to follow 'Respect for People Diversity Workbook' in A5 format.

2.2.3 Consultation and engagement

In many cases, arrangements for consultation and engagement are not yet well developed. There is huge variation across HEIs in relation to what consultation is understood to include. In some cases,

reference to consultation and engagement in the documents received for review is extremely limited. Several HEIs state only that the 'policy and plan have been subject to consultation', for example. Many race equality policies would benefit from some overview of what HEIs hope to achieve through consultation and engagement, who will be included and how this will impact on race equality issues.

Methods of consultation and engagement also warrant further attention. A number of HEIs consider an annual student or staff satisfaction survey to be sufficient. Only a small number of HEIs appear to be considering the full range of possible consultation and engagement methods, and also reviewing what works well and less well in relation to engaging with ethnic minority staff and students in particular. Many HEIs consider existing committee structures as adequate for engaging members of staff and students around race equality issues. This should be considered carefully, as black and minority ethnic members of staff and students may not feel comfortable raising issues in these arenas. Many HEIs therefore have some way to go in developing more creative ways of engaging and consulting with staff and students around race equality issues.

The Royal College of Art invites specific individuals from key organisations to participate in the activities of its Race Equality Action Group.

The University of the Arts in London has undertaken collaborative work with young ethnic minority people to design a careers information leaflet.

Newman College of Higher Education has produced a code of practice on consultation that requires all written consultations to conform to national best practice standards.

Liverpool Hope University College runs a Black Science summer school, with follow-up visits to schools. The college has also undertaken focus groups with leaders from the Muslim community.

At Liverpool John Moores University, a mentoring scheme encourages people from black and minority ethnic communities to sit on university committees.

2.2.4 Partnership work and contracting

In general, HEIs have made considerable progress in embedding race equality in partnership working. Most HEIs recognise the need to consider partnership arrangements in their race equality policies, and many have shown that they are evaluating all current relationships with partners to ensure their compliance with the RRAA. New partners are also made aware of the institutions' race equality policies. Some HEIs have taken positive steps to ensure that tender documents do not inadvertently discriminate against small and medium sized enterprises.

The School of Pharmacy has made comprehensive provision in relation to partnerships, external affairs and procurement. It is also exemplary in providing details on networking and information sharing in respect of collaborative partnerships.

The London School of Economics has adjusted tender documents to encourage applications from small and medium sized enterprises.

De Montfort University is setting up a web page to advertise lower value tenders, with a view to appealing to black and minority ethnic businesses.

2.2.5 Complaints and grievance procedures

In many cases, procedures for taking action in the event of breaches of the race equality policy are not yet clearly articulated. Most HEIs do refer to complaints and grievance procedures, at least in terms of signposting staff and students to the appropriate policies, but there is not always a clear sense of how an individual faced with a contravention of the policy should proceed. In general, race equality policies could be strengthened by inclusion of more information or better signposting to the appropriate processes for students and staff, and the support mechanisms they can draw on. HEIs also need to articulate clearly the consequences of breaches of the policy. The tone in which this section is presented is of crucial importance. A number of HEIs have done this very well, and have effectively conveyed the seriousness with which breaches will be treated, together with a strong sense of the confidentiality and support available to the complainant or victim.

The Royal College of Art has a comprehensive harassment policy, which includes definitions of different types of harassment, and detailed steps to be followed in cases of perceived harassment.

The Institute for Cancer Research provides detailed descriptions of what constitutes inappropriate behaviour, and procedures to follow in the case of any such incidents.

Several HEIs, including Imperial College, have networks of harassment support contacts.

2.2.6 Accessibility and awareness

The quality of written documents varies across HEIs, but for the most part documents are well presented and written. In some cases, race equality policies could be made more accessible with changes to format. Draft policies do not instil confidence. A few HEIs have published their race equality policy in A5 format, in an easily accessible form. A number of policies benefit substantially from the use of diagrams, for example to indicate reporting arrangements or accountability for race equality, as well as definitions of key terms and clear descriptions of procedures in relation to harassment.

A considerable number of race equality policies lack sufficient focus and direction. Phrases such as 'consideration will be given to' are vague, and do not convey a commitment to taking action.

Some HEIs submitted for review a large number of individual documents, including minutes of meetings, monitoring statistics, staff/student handbooks etc. While this information was useful and relevant for this review, it is important that HEIs consider how to demonstrate their progress effectively and succinctly to external stakeholders. Annual progress reports, for example, as submitted by several of the HEIs who appeared to be progressing well, can provide a clear and accessible summary of progress for students, members of staff, partner organisations and/or funders.

There are many examples of HEIs with websites dedicated to race equality, diversity or equality issues, and this practice is generally well developed. Some HEIs also support more specific awareness-raising events, such as lunchtime briefings, lectures, research projects dedicated to race equality issues and the celebration of specific events that emphasise diversity. A number of HEIs are also reviewing whether they need to publish information in languages other than English.

The Royal College of Art has made specific efforts to review its website in light of the needs of potential overseas students seeking information. The college also plans to hold a competition among students to design a front cover for the race equality policy.

At the University of Leeds, key publicity material is translated into community languages, with the help of Leeds City Council.

Liverpool Hope University College and Birkbeck College actively promote diversity in marketing material and publications. During 2004, Liverpool Hope University College is focusing on the theme of internationalism.

The London School of Economics and Political Science has developed a Diversity Toolkit, which is distributed widely. It is used to establish a basic level of understanding of diversity issues, and is accessible and well presented.

The RCN Institute's race equality policy is concise and well presented. The additional glossary is also helpful in explaining the concepts that are used in the policy.

2.3 Appropriate planning and target setting

2.3.1 Monitoring data

The specific duties imposed by the RRAA require higher education institutions to monitor the applications, admission and progression of students and the career progression of staff. Despite this requirement, overall monitoring arrangements are still insufficiently developed in many HEIs. Most have started to monitor the ethnic profile of staff and students, but often in insufficient detail and scope. It is not yet common, for example, for HEIs to monitor the full range of activities, such as staff progression and promotion, student progression and achievement, complaints, grievances, formal disciplinary actions and dismissals, and student drop outs. In many cases, monitoring of students is at a very early stage, and not much progress has been made since previous rounds of assessment.

Few HEIs monitor students in relation to different categories, such as UK and overseas students or mature students.

A number of HEIs have experienced difficulty in preparing consistent data for analysis. However, in a large number of cases additional software is now assisting in the provision of up-to-date monitoring data. Many of these systems are coming on stream in 2004, so the monitoring data available for submission was somewhat limited for many HEIs, but is likely to improve over time as these systems are established.

Beyond the compilation of monitoring data, it is important that HEIs demonstrate that data is used to inform the decision-making process. This is clearly apparent in some cases, where targets have been defined and explained in terms of current figures and recent trends. Several HEIs also provided an analysis of monitoring data in progress reports, with commentary about its implications. This practice is not yet widespread, and the extent to which monitoring data is being actively and effectively used to inform planning is not yet sufficiently clear in many HEIs. Several of the smaller, specialist HEIs expressed concerns about undertaking ethnic monitoring of staff and/or students, especially where numbers are very small.

On the whole there is not a clear sense across HEIs about what data is monitored and how, who is responsible and how data will be analysed, reported and used. Rates of disclosure of ethnic data remain problematic for many institutions. A small number have taken successful action to address this. In a few HEIs, audit tools are being developed for use at departmental level to monitor equal opportunity targets. This seems to be a good way of ensuring that race equality is mainstreamed across all the functions and service areas of HEIs.

Liverpool Hope University College outlines the importance and rationale for equality data collection and target setting in student and staff induction programmes.

2.3.2 Target setting

Setting appropriate numerical targets for proportions of black and minority ethnic staff and students remains problematic for many HEIs. In a small number of cases, HEIs have outlined detailed targets, with clear explanations of how these were arrived at, based on institutional context, baseline data and benchmarking. A few HEIs provide clear benchmarking data allowing comparison with local, regional, and national markets and with similar HEIs. In general, target setting in relation to students tends to be less developed than target setting for members of staff.

In many cases, it is difficult to assess how challenging the targets are, in particular when HEIs have not given an adequate description of the challenges they face in relation to widening access for black and minority ethnic members of staff and students in their particular context. For HEIs in London, for example, it may be advisable to benchmark against regional profiles, rather than national figures, given the higher representation of black and minority ethnic communities in the city.

Some smaller institutions proposed deferring target setting, owing to the mainly white ethnic profile of the local area. This is not an appropriate response, and is out of step with the national and international pool from which institutions may recruit students and members of staff.

Ravensbourne College of Design and Communication uses the Consortium of Arts and Design Institutions in Southern England (CADISE) benchmarking data, which will inform its race equality policy and practice from March 2005.

At Rose Bruford College clear targets are set for the recruitment of black and minority ethnic staff and students. Numerical targets are also set out across various functions, eg the disclosure of ethnic monitoring data, the participation rate in race equality training, and efforts to promote race equality through partnerships and contractual arrangements. The college is also committed to using positive action in specific circumstances if it is deemed appropriate to overcome inequality.

2.3.3 Mainstreaming

There are good examples of HEIs that have taken a pro-active and positive stance to embedding race equality issues. Where embedding has been successful, it is coupled with appropriate leadership and authority. There are still significant numbers of HEIs that do not yet demonstrate clear 'ownership' of the issue across the institution, however. The need to develop innovative ways to tackle the cultural, attitudinal and behavioural aspects of race equality issues remains an unrecognised priority in many cases.

Most HEIs have demonstrated that they have steering groups responsible for race equality issues and that all members of staff and students have specific and individual responsibilities to promote the race equality agenda and comply with the policy. A small number of HEIs have demonstrated how they embed race equality considerations by making their institutions more representative organisations in which to work and study. However, few have demonstrated that race equality concerns are appropriately embedded across different functions and service areas. In many cases the focus is still on process rather than outcomes.

De Montfort University maintains an issues log to provide a systematic means of recording and monitoring progress against diversity issues that cut across more than one strand. This is reviewed systematically at each group meeting. The university also has a diversity risk register that will be incorporated into its risk management policy.

The University of Leeds has appointed diversity officers in each faculty to ensure the co-ordination and implementation of its Race Equality Action Plan. These officers have been given workload remission.

2.3.4 Action plan

This review indicates some causes for concern in relation to progress on action plans. In particular, several HEIs seem to struggle with presenting action plans in a simple and comprehensible yet comprehensive format. The action plans that are most explicit can clearly be related to the institutions' general and specific duties under the RRAA. Furthermore, clear action plans include reference to objectives, tasks to implement objectives, desired outcomes (including numerical targets), target dates for completion, progress and a responsible person/body. A large number of action plans are ambiguous, in particular around time frames. A number of institutions appear to have difficulties determining appropriate deadlines for tasks. Updating action plans is an issue for a large number of HEIs. While most have demonstrated some progress in the documentation submitted, this progress is not always reflected in the action plan.

Some HEIs have made effective use of race equality action plans produced at departmental level. Where there is appropriate leadership in relation to race equality, and where race equality is adequately mainstreamed, this can work well and can be helpful in monitoring race equality targets. In cases where separate action plans have been drawn up for students and staff, it is important to ensure consistency.

De Montfort University's action plan includes a column representing 'groups, including under-represented groups you would strive to consult' against each objective. This indicates a firm commitment to consulting widely on proposed changes to policies and procedures.

2.4 Learning from and reviewing policies and plans

2.4.1 Evidence of learning, impact assessment and review

The RRAA imposes specific duties on HEIs to assess the impact of all their policies on students and staff of different groups. Institutions are expected to develop mechanisms to assess the extent to which all new and existing policies will support or detract from race equality objectives. These reviews should highlight any anomalies or potential circumstances under which particular groups may be disadvantaged by the operation of a particular policy or procedure.

Few HEIs have reached the point where all policies have been reviewed to ensure that the institution is fully compliant with its duties under the RRAA. This is a considerable task that remains a challenge to be tackled for many institutions.

Institutions are also required to review the effectiveness of their race equality policy and action plan regularly, and to make revisions based on learning and experience. A large number of institutions feel that they are still in the early stages of tackling race equality, and are still developing their policies and plans to an appropriate level. For this reason, explicit evidence of learning to date is limited.

However, a significant minority have established effective mechanisms, with arrangements for regular impact assessment, review, reporting and revision.

De Montfort University underwent an independent diversity and equality audit in late 2003. Policies have been reviewed in the light of the findings and analysis.

The University of Greenwich has commissioned a race equality audit focused on staff, and is planning to run a series of focus groups with black and minority ethnic staff and students, facilitated by independent consultants.

The University of Hull has published draft guidance on conducting race impact assessments.

2.4.2 Sharing good practice

Sharing good practice across HEIs is an area that does not appear to be particularly well developed. While institutions might have various reservations about getting involved in good practice or learning networks around race equality, the review indicates a number of areas where they may usefully learn from one another. The ECU could play a useful role in bringing institutions together with others that could benefit from an exchange of experience.

We are aware that race equality issues may well be covered in many of the HR networks that currently exist. However, this is not apparent from the submissions received. At present, it is not possible to get a sense of whether these networks are being used in relation to tackling race equality issues.

The University of Teesside invites an external consultant on an annual basis to discuss progress on equality and diversity issues with the board of governors and senior management.

Kent Institute of Art and Design has been proactive in making contact with the regional race equality council to seek their advice on how to increase applications from black and minority ethnic groups.

The University of London has commissioned the Equal Opportunities Consultancy Group from Royal Holloway to review its recruitment policies and procedures to identify areas of under-representation of specific groups.

The Diversity in Employment Report, by Royal Holloway College with the University of Bath, is an excellent initiative.

2.5 Leadership and commitment

2.5.1 Visible support and commitment at senior levels

Most HEIs indicate that the council, senate and/or board of governors have overall responsibility for ensuring that the race equality policy is planned, implemented, monitored, evaluated and reviewed. In some cases, race equality is championed by the Vice-Chancellor, which seems to be very helpful. Overall, however, HEIs have yet to demonstrate a strong sense of commitment from senior levels. It is crucial that this comes through clearly to ensure that members of staff across all levels buy into the importance of mainstreaming race equality issues across all functions. In some HEIs, senior managers are invited to attend meetings of the race equality steering group, and work has been done to ensure that race equality is a standing item at committee meetings. Initiatives like this can help to ensure that race equality is seen as a key responsibility at senior management level. Some HEIs have also taken steps to ensure that black and minority ethnic groups are represented at governor level, which demonstrates corporate commitment to the issue.

The University of York has created a number of posts to promote diversity, including a project officer for equality and diversity in the curriculum, teaching and learning environment and an RRAA consultation project officer.

At University College Winchester, the 'Cultural Awareness Group' in the school of education is committed to changing the image of the college to one that welcomes students from diverse backgrounds, and not only Christian ones. In this regard, this group demonstrates that change can also be made through committed members of staff, without leadership support.

The University of York's RRAA Implementation Group has started to mainstream diversity by encouraging all committees to include equal opportunities in their terms of reference.

2.5.2 Reporting

The RRAA requires institutions to take reasonable steps to publish the results of monitoring, assessment and review. The extent to which these results, and progress against race equality objectives, are effectively reported and publicised varies widely. A small number of HEIs provided evidence to demonstrate an effective feedback loop that has had an impact on strategic review, planning and the reallocation of resources. Although reporting is a statutory duty under the RRAA, a significant number of policies still lack detail about reporting arrangements. In some cases, reporting is mentioned as part of other sections, on monitoring or impact assessment, for example.

2.5.3 Resources

Few HEIs refer to specific resource allocation in respect of race equality within their action plans, although this is usually implicit in arrangements for staff time associated with particular activities, training, consultation plans etc.

The Surrey Institute of Art and Design demonstrates the allocation of resources to achieve the action plan within the annual budget and encourages budget holders to identify and support equal opportunities within the faculties/departments.

At the University of Leicester an extended investment plan links planned investment to strategic objectives in an easily accessible format.

2.5.4 Holding people to account

Most race equality plans set out roles and responsibilities of staff at different levels. Describing responsibilities does not imply that individuals are necessarily held to account, however. In a very small number of HEIs, all of which are demonstrating good progress, responsibility for race equality objectives is included as part of individual job descriptions and is embedded in performance management processes. Few HEIs appear to have reached this level of integration.

In a significant number of cases, responsibilities remain vested in people rather low in the institutional hierarchy, who seem unlikely to have sufficient authority to ensure progress and implementation. Whilst devolution of responsibility through, for example, departmental action plans seems to work well in some HEIs, as indicated above, it should not simply be a way of shifting responsibility down the chain.

South Bank University appears to be establishing an impressive infrastructure for promoting equality and diversity. This includes an equal opportunities committee working with the board of governors, a cross-university diversity and equality force, diversity and equality committees at faculty/support service level, and a dedicated unit to provide expert guidance and advice.

At the University of Bristol all heads of functions are being issued with action plans relating to their specific areas of operation and asked to report back by specified deadlines.

At the Central School of Speech and Drama, the policy-incident monitoring group, comprising staff and students, is authorised to involve any appropriate external professional and tasked to ensure that the school's leaders are continuously updated on events.

Section 3: Conclusions and recommendations

This review of progress, two years after initial race equality policies and action plans were developed, shows the considerable distance travelled by the majority of HEIs. As noted, 80 per cent are making fair progress, and of these some are showing real innovation and good practice in different areas. Some of the areas of weakness identified in previous rounds of review, in particular partnership working and arrangements with contractors, are now areas of good practice in most institutions.

Links with ethnic minority communities are being actively developed by many HEIs; and opportunities are much improved for institutions to draw on the advice and support of external contacts in formulating their approaches to the race equality agenda. While it is difficult to develop an accurate sense of mainstreaming from a paper-based exercise, there are indications of progress in the extent to which progress is being made against action plans; the greater level of detail available in many such plans about a range of activities; and the involvement of senior management and board members in accountability and reporting arrangements, training programmes and, in some cases, consultative forums. Monitoring arrangements are for the most part at least coming on stream, and in several HEIs data collection is well developed and allows for detailed analysis and identification of trends and areas for attention. Student issues appear to be receiving more attention, although this is not yet the case in all institutions.

3.1 Recommendations

This review of progress has identified a number of areas where HEIs show significant improvement. There are, however, areas in which weaknesses are evident across institutions. This section recommends some actions that ECU, HEFCE and institutions themselves might take to address these issues.

Celebrating the importance of race equality

Institutions need to demonstrate a clearer sense of their priorities and challenges in terms of their particular context. HEIs need to articulate clearly what they are trying to achieve. This should be reflected in a synergy between the corporate vision and mission and the embedding of race equality issues.

The importance of signalling the sustained profile of race equality needs to be recognised. Efforts in this regard include using a positive and proactive tone in policy documents, including race equality objectives in corporate performance indicators, and pursuing engagement, awareness raising and discussion to keep the issue relevant across the institution.

There needs to be a clear sense of 'ownership' of the issue across the institution. Innovative ways to tackle the cultural, attitudinal and behavioural aspects of race equality are needed.

Consultation and engagement

Most race equality policies would benefit from some overview of what HEIs hope to achieve through consultation and engagement, who will be included and how this will impact on race equality issues.

It would also be useful for HEIs to review their success in engaging with ethnic minority staff and student groups in particular, and to consider new and innovative approaches where needed.

Training

Diversity training and awareness raising should be provided for the whole university community, including students, staff at all levels and governors. Raising awareness of the institution's race equality objectives should be an integral part of staff and student inductions.

Creative ways should be explored to target staff across all levels effectively. Many HEIs would benefit from making targeted use of external assistance in developing their training and awareness-raising activities, for example by bringing in representatives from national bodies such as the ECU and the CRE as guest speakers, forging links with local and regional community groups who can offer a fresh perspective, and joining together with other HEIs and learning from their experience.

Monitoring

The level of detail and scope of monitoring activities requires further development. Monitoring categories should reflect the 2001 census categories, and data should provide an appropriate level of detail in relation to department, and in the case of staff, to grade and role.

Specialist HEIs could benefit from guidance on what is needed in their particular context. Wider use of benchmarking data would provide a useful tool for HEIs to compare themselves with similar institutions, as well as allowing comparison with local, regional, and national markets.

Recruitment

Where detailed monitoring data is available for staff, there is evidence across HEIs of the difficulty associated with recruiting appropriate numbers of black and minority ethnic members of staff in academic grades and, particularly, in senior positions. Specialised institutions in particular report difficulties recruiting suitably qualified senior staff from ethnic minority groups, and suggest that it will take time for the availability of such individuals to increase. It might be useful for future research to look more closely at this issue, and the extent to which perceptions match reality.

Action plans

Action plans need to be presented in a simple but comprehensive and comprehensible format, and ideally should show a clear relationship to the institutions' general and specific duties under the RRAA. The action plan should clearly set out how the policy will be translated into practice, and it is crucial that there is synergy between the two documents. HEIs are encouraged to keep action plans updated, to act as an accessible overview for students and staff, and a useful tool in performance management. It is useful to indicate recent progress against objectives within the plans. HEIs can learn from one another in terms of keeping their action plans relevant and dynamic. Several of the action plans submitted were of high quality, and the layout and style used could provide insight for other institutions.

Mainstreaming

It has been difficult for HEIs to demonstrate appropriate mainstreaming of race equality across functions and service areas in this paper-based exercise. However, the clear allocation of resources, appropriate accountability arrangements and visible support from senior levels are crucial in this regard. It is not clear that all HEIs understand what mainstreaming means in relation to race equality. Some guidance on what successful mainstreaming looks like might prove useful.

Targets

HEIs must take on board the requirement to develop numerical targets in respect of the ethnic composition of their workforce. These targets should reflect the local demographic profile and the demographic pool from which staff may be recruited at regional, national, and, where appropriate, international level. Targets should be based on a firm understanding of the opportunities and challenges facing the institution, and informed by analysis of current recruitment and retention patterns.

Institutions are also strongly encouraged to set targets in relation to recruitment and progression of ethnic minority students, based on similar considerations to those above. Benchmarking with similar institutions at regional and national level is a useful mechanism to ensure that targets are realistic and challenging.

Accountability

HEIs need to work towards ensuring that accountability for the race equality agenda is meaningful at the individual level. They need to consider how people will be held to account against objectives, targets set and/or desired outcomes. This might include responsibility for race equality objectives as part of individual job descriptions and in performance assessment frameworks.

Sharing good practice

HEIs are encouraged to become more involved in networking and sharing good practice. While institutions might have reservations about getting involved in good practice or learning networks, the review indicates a number of areas where they may usefully learn from one another. The ECU could play a useful role in helping institutions to identify others that could benefit from an exchange of experience.

Reporting

Given the importance of clarity and appropriate accountability in reporting arrangements, policies should include a section detailing responsibility for the collection and analysis of data, the frequency of reporting, who the relevant individuals/groups/committees will report to, and how widely results will be publicised.

Resources

In future, it may be useful for HEIs to include some level of budget planning within action plans, to ensure that activities related to race equality are appropriately mainstreamed and sustained across all activities.