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Cylchlythyr | Circular

Race equality in higher education and 2022/23 allocations and 2021/22 monitoring

Date: 25 July 2022
Reference: W22/25HE
To: Heads of higher education institutions in Wales
Response by: 14 October 2022
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This circular provides race equality guidance, including details of HEFCW's £1m allocation for 2022/23 with our match funding expectations. The circular also provides 2021/22 monitoring requirements.

If you require this document in an alternative accessible format, please email info@hefcw.ac.uk.



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Introduction

1. This circular provides race equality guidance, 2022/23 allocations and our match funding expectations. The circular also provides 2021/22 monitoring requirements to support race equality and tackle anti-racism in higher education.
2. HEFCW's [remit letter 2022-2023](#) (paragraph 15) from the Welsh Government commends higher education's contribution to the Welsh Government's commitment to an anti-racist Wales. The Welsh Government expects higher education to work towards the achievement of a charter mark as a demonstration of commitment to eradicating racism and racial inequality at all levels within the sector.
3. The race equality charter is one mechanism universities can use to inform action on race equality and tackling anti-racism. The achievement of a charter mark is not an end in itself.
4. The Welsh Government's [Anti-racist Wales Action Plan](#) has recently been published with actions for higher education. We will publish further guidance where we have not taken sufficient account of any aspect of the Welsh Government Action Plan.
5. Through circular [W22/05HE](#) we allocated £500k for universities to invest in strengthening their race equality commitments in 2021/22. We confirmed funding of £1m annually in 2022/23, 2023/24 and 2024/25, subject to HEFCW budgets (and the transition to the Commission for Tertiary Education and Research) and satisfactory commitments from universities. The 2022/23 allocations were conditional on universities match funding our allocations.
6. Circular [W22/05HE](#) consulted on aspects of this funding. A summary of the responses and how we took account of them can be found in **Annex A**.

The purpose of additional race equality funding

7. We set out the purpose of the race equality funding in our consultation circular [W22/05HE](#) (paragraph 6). As we indicated, the purpose of this funding is wider than the achievement of a charter mark. This funding is to prevent inequality, tackle anti-racism, support culture change and contribute to delivering the Welsh Government's Anti-racism Wales action plan.
8. While this funding is framed in terms of race, universities should use it to take action on issues as they intersect with race, including, but not limited to identity-based harassment, violence and abuse, and race, religion and belief. Universities UK has published two briefings on religion and belief which should inform race equality considerations: [Tackling antisemitism: a practical guide for universities](#) (June 2021) and [Tackling Islamophobia and anti-Muslim hatred: practical guidance for universities](#) (December 2021). These briefings are part of its wider changing the culture framework.

2022/23 allocations and conditions of funding

9. In 2022/23 universities' allocations:
 - i. include a funding floor of £50k for the HEFCW allocation but do not include a funding floor for the £1m institutional match funding;
 - ii. use HESA 2020/21 student data which are based on the HESA standard registration population, reduced to a headcount i.e. if a student has more than one enrolment then they are counted once;
 - iii. use student data which includes the whole student body: all modes, levels, domiciles;
 - iv. are based on verified HESA data (for 2022/23, we are using the same data as we used for the 2021/22 allocations. For future allocations we will update the HESA data annually and will ask universities to verify the data);
 - v. as is our usual practice, Royal College of Music and Drama student data is included with University of South Wales data and allocation;
 - vi. will be made in November 2022 and March 2023, subject to funding conditions below.

10. The conditions of funding for 2022/23 are as follows:
 - i. the HEFCW allocation from 2022/23 onwards is subject to universities committing to match fund allocations in 2022/23, 2023/24 and 2024/25.
 - ii. allocations from 2022/23 onwards are subject to all institutions continuing to be members of a race equality charter;
 - iii. HEFCW allocations are conditional on universities demonstrating that they are taking all reasonable steps to achieve a charter mark by 2024/25.
 - iv. we reserve the right to withhold or clawback funding, including for the following reasons, where funding: has not spent in full; has not been spent in the academic year in which it was allocated; where other funding conditions have not been met; where full and satisfactory reporting has not been received by us; or where funding has not been utilised for the purposes for which it was intended;

11. Our expectations for the use of match funding are that:
 - i. the HEFCW allocation should not result in any decrease in universities' existing resourcing of race equality developments, including their commitment to achieve the charter, prior to the April 2022 HEFCW allocation;
 - ii. universities commit additional resource to support race equality, over and above the HEFCW £1m total allocation;
 - iii. where any existing race equality activities or services are funded through fee and access plan or other sources, these activities and services may be increased by HEFCW or institutional match funding. Where this is the case, the university must make clear in all reporting and race equality monitoring how and to what level this funding has enhanced activities and services and may be subject to audit by us;
 - iv. the match funding and the HEFCW allocation leads to an increase in pace, and progress towards, tackling anti-racism, improving race equality, and achievement of the charter mark;

- v. match funding or HEFCW funding can be used to meet the costs of relevant membership subscriptions, externally facilitated training or other external expertise.

12. 2022/23 allocations are as follows:

Institution	2022/23 HEFCW allocation (with £50K floor) £	2022/23 Universities' match funding (no floor) £	2022/23 Total £
University of South Wales	161,558	162,080	323,638
Aberystwyth University	52,326	52,495	104,821
Bangor University	68,328	68,549	136,877
Cardiff University	233,910	234,665	468,575
University of Wales Trinity Saint David	103,123	103,456	206,579
Swansea University	150,918	151,406	302,324
Cardiff Metropolitan University	80,272	80,531	160,803
Wrexham Glyndŵr University	50,000	46,932	96,932
Open University in Wales	99,565	99,886	199,451
Total	1,000,000	1,000,000	2,000,000

Deliverables and monitoring

2021/22 deliverables and monitoring

13. The deliverable is a completed monitoring report to account for the allocation and a summary of institutional progress against the relevant recommendations for universities in the [Equality and Human Rights Commission's Tackling racial harassment: Universities' Challenged](#) report. See **Annex B**.

2022/23 deliverables and monitoring

14. Deliverables will be confirmed once we have taken account of the Welsh Government's Anti-Racist Wales Action Plan, but they will include:
- i. The university's race equality action plan covering 2022/23 including progress to July 2023 and
 - ii. A funding statement to account for the HEFCW allocation and institutional match funding. We recognise that the institution's race equality charter action plan may provide a satisfactory account for the majority of this funding and provide us with sufficient assurance on management and governance structures, annual milestones, pace, progress made and ambition. Where this is not the case we will ask for additional information.

Monitoring submission dates and returns

15. For 2021/22 monitoring the submission date is **Friday 14 October 2022**.
16. For 2022/23 monitoring the submission date is **Friday 13 October 2023**.

17. Please return completed monitoring to amanda.phillips@hefcw.ac.uk.

Assessing the impact of our policies

18. We have undertaken an impact assessment on the race, access and success policy developments. In updating the impact assessment we have included assessment of the race, access and success funding methodology to help safeguard against discrimination and promote equality. We also considered the impact of policies on the Welsh language, and Welsh language provision within the HE sector in Wales and potential impacts towards the goals set out in the Well-Being of Future Generations (Wales) Act 2015 including our Well-Being Objectives. Contact equality@hefcw.ac.uk for more information about impact assessments.

Further information

19. For further information, contact Jane Johns (jane.johns@hefcw.ac.uk).

A summary of consultation responses to the funding methodology and how we took account of them

1. We received responses to our consultation questions from nine universities, including the Open University in Wales, and a broader submission about the Advance HE race equality charter from the Universities and Colleges Union (UCU). We have arranged to meet UCU officials to understand how we might take account of its views in policy developments. UCU has published its response to us [UCU Cymru response to HEFCW funding to support race equality](#).
2. Our consultation questions, a summary of the responses and how we have taken account of them, are set out below.

Consultation question one: Is the allocation methodology fair and transparent? If not please explain why.

3. Seven universities considered the funding methodology fair and transparent. Two universities considered that the funding should be weighted in favour of smaller institutions with limited resources and one university queried whether all its data were included in modelling. We have confirmed the data have been verified by universities.
4. As the majority of universities considered the funding methodology was fair and the model used a £50k floor, we did not adjust the allocations. For 2022/23 allocations universities that benefited from a floor will not be required to include a floor in their match funding.

Consultation question two: Are there any unintended consequences or adverse impacts of the proposed allocation method? If so please explain.

5. Three universities confirmed there were no unintended consequences of the methodology. Two universities neither agreed nor disagreed, with one university requesting early notice of 2022/23 funding to facilitate planning and budgeting. Two universities raised a point about funding smaller institutions as noted in question one above. One university raised a funding issue relating to its particular structure.
6. As there was no consensus or alternative funding approach proposed we have not amended our methodology.

Consultation question three: Is there any further comment on the funding methodology you would like to make, including as it aligns, or otherwise, with our commitments to the Well-being of Future Generations Act, its sustainable development principle, goals and ways of working?

7. Four universities did not provide further comment. Some universities provided useful steers and asked for clarification, which we provide below:
 - One institution queried our requirement to use the April to July 2022 funding in-year. We expect universities to use this small allocation before July to put in place plans, activities, services and resources to ensure they are prepared to use the 2022/23 funding from the start of the academic year. Where

universities have not had a use for this funding we reserve the right to claw back or withhold funding.

- One university sought clarity on the use of match funding. We provide match funding information in this circular.
 - Two institutions asked us whether we had, or could, take account of existing institutional resource and expertise, including an EDI team's staff diversity, progress towards addressing racial inequalities, or existing staff and student diversity when allocating funding. We are unclear how we could make transparent, evidence-based judgements on universities' existing resources to inform funding decisions. Our funding methodology takes account of all students to recognise duties under the Equality Act and Public Sector Equality Duty (Wales).
 - Two universities noted that race equality contributes to meeting the Well-being of Future Generations Act goals.
8. *Questions four to six:* We asked three questions in relation to impacts on the Welsh language and our funding's positive or negative effects on it:
9. Most respondents did not identify any positive or negative impacts on the Welsh language. One university considered the funding might enable analysis of data relating to Welsh speaking minority ethnic students in HE.