

Cylchlythyr | Circular

Consultation on monitoring race equality in higher education

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To: Heads of higher education institutions in Wales
Response by: Friday 23 September 2022
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This consultation invites responses on monitoring race equality in higher education, as it relates to staff and students.

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Introduction

1. This consultation invites responses on HEFCW's proposed monitoring of race equality in higher education in Wales. We will monitor staff and student data. We will publish our monitoring annually at a national level.
2. The purpose of race equality monitoring is to have a more detailed understanding of the diversity of the higher education population in Wales (staff and students).
3. This race equality monitoring will inform our race equality policy development, our strategic equality plan commitments and contribute to the Welsh Government's [Anti-racist Wales Action Plan](#) (The Plan). Our intention is to work with higher education providers to change the culture in higher education, tackle racism and secure race equality.

Background

4. In the Anti-racist Wales Action Plan, the Welsh Government confirms its expectations that:

‘the HE sector will make rapid and sustained progress in tackling racism and in improving the experience of ethnic minority staff and students in HE’ (p.42).

As part of actions to achieve this, the Plan notes: ‘To measure change over time we have an urgency to improve both the completeness and the use of data on ethnicity in education. We need to use data currently available more systematically’ (p.41).
5. There is an action on higher education to ‘Publish an annual race equality report and performance measures for the sector, including outcomes for students and staff’ from 2023.

Introducing race equality monitoring: benefits and limitations

6. The Anti-racist Wales Action Plan identifies actions to be undertaken between June 2022 and June 2024. We do not want to delay taking further action on race equality or on responding to the Anti-racist Wales Action Plan.
7. Our race equality monitoring may develop and evolve over time, in consultation with providers and other interested parties, taking into account reviews of the Anti-racist Wales Action Plan and including as we transition into the Commission for Tertiary Education and Research which will have responsibilities for the whole post-16 sector.
8. We routinely collect relevant data and analyse trends to inform our understanding of equality-related matters and to meet the aims of the General and the Wales-specific Equality Act duties placed upon us. In addition, we engage with

stakeholders, relevant UK bodies and other organisations in Wales to monitor and benchmark our progress and inform policy.

9. Monitoring should contribute to our understanding of staff and student diversity in higher education over time. Race equality monitoring will enable us to evidence progress towards our ambition to increase the access, retention and success of people (staff and students) in higher education in Wales from Black, Asian and minority ethnic backgrounds.
10. Race equality monitoring will not be an end in itself. Data monitoring is only one mechanism we use to assess sector and individual higher education provider performance, providing us, governing bodies and other interested parties with evidence of progress and improvement over time and demonstrating the impact of investment from public funding. We will use our policy and funding levers, as well as qualitative analysis, as appropriate to contribute to the Anti-racist Wales Action Plan and the Well-being of Future Generations goals, including but not limited to an equal Wales.
11. We are proposing to develop and publish annually a new race equality monitoring report. Our monitoring will be based on analysis of some key data relating to staff and students. The monitoring will focus on:
 - i. access and recruitment to higher education for staff and students;
 - ii. retention in work or study; and
 - iii. academic and professional progression for staff and students.
12. Our monitoring will use a range of data as proxy measurements of progress, recognising their limitations. A limitation of the data we will monitor is that it may not be possible to publish intersectional data due to data disclosure issues, as often the numbers involved can be small.
13. The data proposed provides a means of understanding more about race equality at key points for staff and students. We recognise that these key points are proxy measures and, therefore, will be considered alongside qualitative evidence.
14. Some of our monitoring focuses on unexplained gaps in outcomes between people with different backgrounds. We recognise that people from, and within, different backgrounds face different barriers to accessing and succeeding in higher education.
15. There are potential unintended consequences in monitoring certain data. One such consequence may be a tendency to focus only on what can be measured – even if the data used is a proxy which contributes to the desired outcome. Once monitoring parameters are agreed, other areas, which are not subject to monitoring, might be deprioritised. In addition, there are many areas of higher education work which have a longer term impact on individuals and communities which may not be monitored in a quantitative way or be outside higher education's sphere of influence.

16. We aim to use data already available to us, for example individualised data collected by HESA, or we will use publically available data such as data held by UCAS, wherever possible to reduce the reporting burden on higher education providers. While we are able to analyse individualised HESA data as required, it is possible that interpretation of, and ability to publish, the data may be limited due to the presence of small numbers and the need to abide by data disclosure control practices. Where we identify areas of concern in race equality we will drill down in the data to identify if there are underlying factors we should address. We will use additional, supplementary monitoring, our annual equality plan reporting or commission research, to address new and emerging issues of concern.
17. In line with HEFCW's standard data disclosure control procedures¹ some data we monitor may include numbers too small to be published. Where publishable numbers are small slight increases/decreases significantly impact on changes in proportions of students or staff in a dataset. Some data include high levels of 'unknown' or 'refused' data where data may be missing or individuals choose not to respond. Small numbers and/or an absence of data is significant and we will work with universities to understand whether data collation can be improved, recognising that individuals retain the right to refuse to provide information.
18. We respect the uniqueness of different racial backgrounds. We will aim to disaggregate data where possible to reflect the experience of different groups. Where we aggregate data our intention is to avoid publishing data that are too small and, therefore, with the potential to disclose individuals' identity. Such aggregation is not intended to be disrespectful but to enable us to highlight issues revealed in the data which should be addressed by policy and practice.
19. In some areas of our proposed monitoring our data analysis has shown that there are unexplained differences in the number and/or proportion of students or staff from different racial backgrounds. To monitor how effective higher education is in addressing race equality, we propose to monitor these differences which we describe in our monitoring as 'unexplained gaps'. An unexplained gap includes taking account of diversity in the general UK population.

Proposed monitoring

20. We have analysed the wide range of staff and student data available to us. Based on this survey of available data and the areas of focus identified above, we propose to monitor the following annually for Welsh providers:

Pre-entry: UCAS applicants

- i. the number, proportion, annual percentage change in number and annual percentage point change in the proportion, of UCAS **applications** to full-time undergraduate courses from UK domiciled applicants from Black, Asian and minority ethnic backgrounds.

¹ HEFCW's data disclosure control methodology is based on the HESA Services standard rounding methodology.

- ii. the number, proportion, annual percentage change in number and annual percentage point change in the proportion, of UK domiciled, UCAS **applicants** to full-time, undergraduate courses from Black, Asian and minority ethnic backgrounds.
- iii. the unexplained gap between the **offer rate** for 18 year old UK domiciled applicants to undergraduate courses for full-time, UCAS applicants from white, Black, Asian and minority ethnic backgrounds.
- iv. the number, proportion, annual percentage change in number and annual percentage point change in the proportion, of UK domiciled UCAS **placed applicants** to full-time undergraduate courses from white, Black, Asian and minority ethnic groups.

Access, retention and success: undergraduates (HESA student record)

- v. the number, proportion, annual percentage change in number and annual percentage point change in the proportion, of **UK domiciled entrants to full- and part-time undergraduate courses** from Black, Asian and minority ethnic backgrounds.
- vi. the unexplained gap between the proportion of entrants from white, Black, Asian and minority ethnic backgrounds who did not leave within 50 days of commencement and **are present in higher education**:
 - 1) **one year following year of entry**, for full-time undergraduate UK domiciled entrants; and
 - 2) **two years following year of entry**, for part-time first degree UK domiciled entrants.
- vii. the unexplained gap in degree **outcomes** (firsts and 2:1s) between students from white, Black, Asian and minority ethnic backgrounds, for UK domiciled students studying full- and/or part-time.

Access, retention and success: staff, by academic and non-academic (HESA staff record)

- viii. the number, proportion, annual percentage change in number and annual percentage point change in the proportion of **staff** from white, Black, Asian and minority ethnic backgrounds .
- ix. the unexplained gap between the proportion of **staff** from white, Black, Asian and minority ethnic backgrounds on permanent terms of employment.
- x. the unexplained gap between the proportion of staff from white, Black, Asian and minority ethnic backgrounds in each **grade**² group.

² Grades are set out in [Contract levels](#).

Governance

- xi. the number and proportion of **governors** from white, Black, Asian and minority ethnic backgrounds.

Data and general information

21. We will use the following datasets:
 - i. UCAS³ data for applications, offers, applicants, placed applicants
 - ii. HESA student record⁴ – entrants, retention, outcomes
 - iii. HESA staff record⁵ – terms of employment, grade and
 - iv. HEFCW assurance monitoring - governors.
22. We will monitor data at an individual institutional level, but we will publish data at a Wales sector level only.
23. We will use the definitions of race as defined by these datasets.
24. We will monitor UK domiciled applicants, entrants and students, as it is not mandatory to collect information on ethnicity for those who are non-UK domiciled. We will monitor all staff, as it is mandatory to return information on ethnicity for staff.
25. We will use the UCAS and HESA data with ethnicity categories of white background, Black background, Asian background, Mixed background and other minority ethnic backgrounds. (Other minority ethnic backgrounds includes Arab and other minority backgrounds not otherwise included in the categories above.)
26. We will monitor degree outcomes where the grade is a first or 2:1 as these grade awards normally are required to enable students to progress to postgraduate level study and we want to increase race equality in various measures of access and success, including postgraduate study.
27. To compare data relating to people with different backgrounds we will monitor the unexplained gap between people from different racial backgrounds and/or we will analyse the numbers of people from different racial backgrounds. As noted in the section above on the benefits and limitations of the data, an unexplained gap includes taking account of diversity in the general UK population.
28. Monitoring of student retention (number vi above) is currently sourced from HESA UK performance indicators which were published for the last time using 2020/21 data.⁶ Therefore, the method for calculating this will be revised for 2021/22 data onwards.

³ [UCAS Undergraduate sector-level end of cycle data resources 2021](#)

⁴ [HESA student record 2020/21](#)

⁵ [HESA staff record 2020/21](#)

⁶ [HESA UK Performance Indicators.](#)

29. As HESA data collection relating to governing bodies will end, we propose to collect diversity of governing body data directly from universities through annual monitoring returns to us.
30. We will take 2016/17 as a baseline year and initially publish five years of trend data 2016/17 to 2020/21 at a Wales sector level and in future we will add annually to this time series. A five year trend will enable us to monitor changes over time from a base year.

Consultation questions

- i. Do you agree with our proposed monitoring as set out in this consultation and the data we will use to evidence progress? If you do not agree, please explain why and give an alternative, taking account of publically available data and number of monitoring points.
- ii. Are there any data included in our proposed monitoring that we should not monitor and publish and, if so, why?
- iii. Are there any other student or staff data we should monitor and publish and, if so, why?
- iv. In relation to staff grades, we propose that all monitoring of staff data should be split by academic and non-academic staff.
(Non-academic staff are identified where the academic employment function field in the HESA staff record [CONTRACT.ACEMPFUN](#) = 40.)

We propose that analysis of grade is conducted using the following groupings:

- 1) Head of Institution/PVC/Director/Head of School/Senior function head
- 2) Professor
- 3) Function head/Senior Manager/Senior lecturer/lower grades

(Details on staff levels is taken from the [CONTRACT.LEVELS](#) field in the HESA staff record. More information on levels can be found on the HESA website: [Combined levels](#).)

Are these groupings reasonable or are there other groupings that would be more meaningful, and if so, why and what other method should be used?

- v. What **effect** (if any), positive or adverse, will the monitoring have on:
 - **opportunities** for persons to use the Welsh language; and
 - **treating** the Welsh language no less favourably than the English language.
- vi. How could the monitoring be changed so that the policy decision would have **positive effects**, or increased positive effects, on:
 - **opportunities** for persons to use the Welsh language; and
 - **treating** the Welsh language no less favourably than the English language.

- vii. How could the monitoring be changed so that it would **not have adverse effects**, or would have decreased adverse effects, on:
- **opportunities** for persons to use the Welsh language; and
 - **treating** the Welsh language no less favourably than the English language.

Further information and responses to

31. For further information, contact Jane Johns (jane.johns@hefcw.ac.uk) with responses to Amanda Phillips (amanda.phillips@hefcw.ac.uk) by **23 September 2022**.

Assessing the impact of our policies

32. We are impact assessing our race access and success policy developments and have updated the assessment to include this proposed race equality monitoring consultation.