

Cylchlythyr | Circular

Safe and inclusive higher education: supporting equality and diversity education

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To: Heads of higher education institutions in Wales
Principals of regulated further education colleges in Wales
Response by: No specific response required but actions have deadlines
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This circular provides information and guidance to universities and regulated colleges in Wales on supporting equality and diversity in higher education. The circular sets out specific actions Welsh Government and/or HEFCW expects universities and regulated colleges to take.

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Introduction

1. This circular provides information and guidance to universities and regulated colleges in Wales on supporting equality and diversity in higher education. The circular sets out specific actions Welsh Government and/or HEFCW expects universities and regulated colleges to take.
2. Safe and inclusive higher education and equality and diversity considerations contribute to complying with Equality Act duties and support the Well-being of Future Generations Act goals, particularly of an Equal Wales and a Healthy Wales¹. The five ways of working inform HEFCW's impact assessment of policies². We encourage institutions to include consideration of the Act's sustainability principle, goals and ways of working in their impact assessments.
3. This circular takes account of relevant equality and diversity legislation, recent policy and practice developments as this relates to the UK, Welsh Government, HEFCW, and as the post-16 sector moves towards operating within the Commission for Tertiary Education and Research (the Commission). The Tertiary Education and Research (Wales) Act (September 2022) places strategic duties on the Commission relating to promoting equality of opportunity, and collaboration between providers of tertiary education and trade unions. There are conditions of registration duties on providers relating to supporting and promoting the welfare of students and staff.
4. Forward planning in this circular is limited to priorities that HEFCW is able to take forward before the new Commission is operational in 2024. In this context, there are some constraints on HEFCW's capacity and reach. We are conscious that some commitments might more properly be framed and have greater impact within a post-16 context and endorsed by the Commission.
5. This circular should be read in conjunction with [HEFCW Strategic Equality Plan: March 2022 - April 2024](#).
6. The actions expected of universities and regulated colleges are set out below and summarised in a table headed 'Summary of actions on universities and regulated colleges'.
7. The circular takes account of:
 - The Welsh Government's [LGBTQ+ Action Plan for Wales](#)
 - The Welsh Government's [Violence against women, domestic abuse and sexual violence: strategy 2022 to 2026](#);
 - The Welsh Government's [Anti-racist Wales Action Plan](#);
 - HEFCW's race, access and success policy developments; and
 - HEFCW's Well-being and health, including mental health policy developments.

¹ We recognise the goals are interdependent.

² The five ways of working: prevention, collaboration, involvement, integration and long-term thinking and action

UK-wide policy and practice

8. As higher education in Wales operates in a national, UK and international context it is informed by, but not always subject to, UK higher education-related legislation and data as well as international research and guidance. Current key policy and legislative developments in other parts of the UK include:
 - i. The [Higher Education \(Freedom of Speech\) Bill](#) was introduced in the House of Commons in 2021. The Bill is currently in its final stages with consideration of amendments underway.
 - ii. The UK Government established a Taskforce on Anti-Semitism, with a focus higher education. The UK Government's independent adviser on Anti-Semitism, Lord Mann, is overseeing a report to be published in March 2023, on Jewish students' experiences in HE. HEFCW has provided information to inform the report.
 - iii. In February 2023, the Office for Students published its [Consultation on a new approach to regulating harassment and sexual misconduct in English higher education](#). The purpose of additional regulation is to place *'substantive enforceable obligations on universities and colleges to ensure that students are protected from harassment and sexual misconduct'* (p8).
 - iv. Since 2016, [Universities UK](#) has published a series of Changing the Culture publications to influence and shape equality and diversity in UK higher education.
9. The Equality and Human Rights Commission, not HEFCW, is the regulator of equality and diversity in Wales.

Welsh Government and HEFCW priorities

10. Key themes of the Welsh Government's strategies and plans are safe and inclusive higher education; whole university approaches; changing cultures, reviewing policies and practices through a lens informed by the needs of people with protected characteristics; the importance of intersectionality; tackling violence, abuse and harassment in all its forms and continuous improvement. Additionally, HEFCW's expectations on universities and regulated colleges include improving data and evidence-based policy and practice, ensuring policy and practice is informed by impact assessment and sharing knowledge and practice to secure equity of equality and diversity support across higher education for applicants, students, staff and all those who engage with higher education.
11. In this context, we would like to see universities in Wales being clear that they stand against all forms of violence, abuse and harassment in higher education, regardless of a person's identity.

Welsh Government LGBTQ+ Action Plan for Wales

Intersectionality considerations

12. The Welsh Government's LGBTQ+ Action Plan for Wales (p50) expects *'that all colleges and universities in Wales are LGBTQ+ inclusive environments for learners, students and staff'* and it sets out the outcomes it expects to achieve.
13. To deliver these outcomes the Welsh Government commits to working with universities:
 - i. 'to encourage universities to take account of issues of intersectionality, including sexual orientation and gender reassignment, when considering how they support their diverse staff and student populations; and
 - ii. to ensure their Strategic Equality Plans (SEP) set out how they will meet their duties under the Equality Act 2010 including as this relates to gender reassignment and sexual orientation.'
14. Intersectional considerations are fundamental and should underpin equality and diversity developments and encompass all protected characteristics including, but not limited to, sexual orientation and gender. We recognise that HEFCW and the sector has more to do to improve its intersectional data collection and analysis. We commit to further progress to support evidence-informed policies and actions.
15. We strongly encourage universities to demonstrate how they take account of issues of intersectionality in their support of all applicants, students, staff and others and to ensure their strategic equality planning sets out actions to support their diverse populations, including as this relates to gender reassignment and sexual orientation.

Welsh Government Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV) Strategy

16. The Welsh Government's Violence Against Women, Domestic Abuse and Sexual Violence Blue Print (May 2022) recognises that women and children are most affected by violence, domestic abuse and sexual violence. In this strategy period the scope has been extended to include street and workplace harassment.
17. The strategy that:
 - i. 'Professionals in Education, Health, Housing and other areas can be the first line of defence against VAWDASV and securing safety for victims (p15); and
 - ii. understanding the equality impact of VAWDASV on an intersectional basis will be vital if we are to address the problem for everyone in Wales and recognise the cumulative impact intersecting disadvantage can have. Looking through the lens of intersectionality will also help us develop our comprehensive understanding of VAWDASV to include the needs of all those affected including children, older people, Black, Asian and Minority Ethnic people, disabled people and LGBTQ+ communities (p17).'

18. Tackling violence, harassment and abuse in all its forms, regardless of individual identities, is fundamental to supportive working and learning environments. The VAWDASV strategy identifies three aspects of prevention that should underpin safe and inclusive higher education:
 - primary prevention: preventing violence before it occurs;
 - secondary prevention: responding to violence to minimise harm, improve services and prevent further violence; and
 - tertiary prevention: preventing recidivism and intergenerational cycles of abuse.
19. Additionally, the Welsh Government's updated [Programme for government](#) (December 2021) commits to 'expand the 'Ask and Act' and 'Don't be a Bystander' training and awareness campaigns'.
20. The [UNISAFE Project - UniSAFE](#) is an European Union-funded project that aims to produce better knowledge on gender-based violence and sexual harassment in research performing organisations (RPOs), and to translate this knowledge into operational tools for higher education, research organisations and policymakers. The project will result in an operational toolkit and recommendations to reduce gender-based violence in the European academic and research area.
21. Universities and colleges should ensure that, as they develop their evidence- and data-informed strategic equality delivery planning and well-being, health and mental health strategy and implementation planning, they include actions to strengthen preventative approaches to tackling violence, harassment and abuse in all its forms, regardless of identity and across all areas learning and working.
22. We expect universities' actions to include appropriate VAWDASV training rolled out comprehensively and effectively for all staff and students, Further actions should include promoting information on reporting such incidents, including how staff and students reporting these incidents will be supported, and a commitment not to use non-disclosure agreements (NDAs) in cases of sexual misconduct [Welsh universities' statement on use of NDAs](#).

Welsh Government Anti-racist Wales Action Plan

23. The Anti-racist Wales Action Plan (June 2022) sets out the Welsh Government's intentions to make Wales anti-racist. There are separate goals and actions for further and higher education providers. In addition to actions which involve universities as partners, there are two higher education-specific goals:
 - i. 'staff and students can expect their experience of HE to be positive irrespective of their racial and ethnic background (p78); and
 - ii. better use of levers available to promote anti-racist culture in higher education' (p.79).
24. Our key actions to date contributing to these goals are set out in **Annex A**. We recognise that there is more to do and we will build on these initial actions to

- achieve the long-term goals, including improving collaboration and involvement as we move to operating in a post-16 systems under the Commission for Tertiary Education and Research.
25. Universities must take action to deliver the higher education-related actions set out in the Anti-racist Wales Action Plan within the timeframe set by the Welsh Government. Specifically, institutions must:
 - i. review existing recruitment policies and procedures through an anti-racist lens by September 2023;
 - ii. monitor and address inequalities, including pay disparities by September 2023;
 - iii. achieve a race equality charter mark as a condition of funding within three years to embed anti-racism policies at all levels within the sector. Institutions must make a commitment to the charter by September 2023.
 26. The Welsh Government and HEFCW expects universities to collaborate with, and involve, students and unions as partners in the higher-education specific Anti-racist Wales Action Plan actions.
 27. The Welsh Government expects universities to collaborate effectively on Anti-racist Wales Action Plan actions which include higher education as a partner where others lead on the action.
 28. In reviewing existing recruitment policies and procedures through a lens that takes account of a protected characteristic, as the Anti-racist Wales Action Plan requires, universities should assure themselves that due consideration is given to all protected characteristics and intersectional characteristics.
 29. At First Minister's Plenary in the Welsh Senedd in March 2023, the First Minister, Mark Drakeford, said he was keen to see universities adopt the International Holocaust Remembrance (IHRA) definition. The First Minister noted that universities are obliged under the public sector equality duty to have regard to equality and human rights responsibilities, and that the Welsh Government's forthcoming review of the duty would include consideration of the IHRA definition³.

HEFCW's race, access and success policy developments

30. **Annex A** sets out our initial key actions. Our actions have been informed by UK and Wales-specific data where this is available. We indicate where actions specifically contribute to the Anti-racist Wales Action Plan. We acknowledge fully that there is more to be done by HEFCW, the Commission for Tertiary Education and Research and all education providers. We commit to delivering on the short-term actions in the Anti-racist Wales action plan and working collaboratively in the longer-term to secure its objectives.

³ For more information [read](#) the exchange in the Record of Proceedings. Plenary 28/03/2023 - Welsh Parliament

31. Our ability to analyse intersectional data is developing and we anticipate publishing more intersectional data in the future which take account of multiple protected characteristics, including to inform our strategic equality planning and policy developments.
32. To contribute to an evidence base for further policy development, we published [W22/28HE: Consultation on monitoring race equality in higher education](#). We set out how we have taken account of responses in **Annex B**. We recognise that the areas we will monitor are proxy measures with some limitations. We may expand them as data improves. The areas we will measure are set out in **Annex C**. We will publish the data annually on our website at a Wales-level ([Equality and diversity statistics](#)) at Wales-level. Some data are small, which we accept is significant in itself. A brief analysis of the data is available on our website.

Well-being and health, including mental health and our policy developments

33. The Welsh Government has not revised its Together for Mental Health Strategy at the time of writing. The papers for the Connecting the dots: tackling mental health inequalities in Wales report: [Coordinated cross-government action](#) confirm that: ‘Stakeholders described the strategy’s review and refresh as an opportunity to address the needs of a wider range of communities who experience discrimination and/or disadvantage, including, for example, older people, Gypsies and Travellers, and people living with chronic conditions. It also provides opportunities to learn from the COVID-19 pandemic, particularly “the entrenched and widening existing economic, social, cultural and environmental inequalities that have led to poorer mental health”. There were some concerns that ‘more needs to be done to bring together the various action plans and policies relating to mental health, health inequalities, and to particular groups and communities who may experience discrimination or disadvantage’.
34. In July 2022, The Senedd’s Children, Young People and Education Committee opened an inquiry into [Mental Health support in Higher Education](#). The consultation responses and evidence have been published. The report will be published in Spring 2023.
35. Our key actions to support well-being and health and mental health include:
 - i. continuing funding and monitoring of universities well-being and health strategies, implementation plans and suicide safer strategies;
 - ii. continuing to fund some well-being and health projects through Strategic Investment Funding;
 - iii. continuing to support [Student space](#);
 - iv. sharing practice on effective evaluation and well-being and health provision in Wales;
 - v. reviewing our position statement on well-being and health, including mental health.
36. HEFCW expects that institutions should:

- i. improve data collection and analysis to evidence effective practice and focus resources;
- ii. collaborate to share practice and maximise public funding on:
 - engaging effectively with health boards and third sector organisations, including using agreed definitions of mental health to improve the communication of students' mental health support needs;
 - supporting the well-being and health of Welsh speaking students;
 - embedding early intervention and preventative approaches for staff and students such as, but not limited to, social prescribing;
- iii. continue to impact assess their policies and plans to take account of staff and student well-being and health, including mental health, and impacts on people who may experience discrimination or disadvantage and/or because of protected characteristics.

Summary of actions on all universities, including some which relate to regulated colleges

37. Universities and regulated colleges should:

Action and paragraph reference in this circular	When	Action expected by Welsh Government, HEFCW
To take account of issues of intersectionality, including sexual orientation and gender reassignment, when considering how they support their diverse staff and student populations;	Medium term ⁴	Welsh Government
to ensure their Strategic Equality Plans (SEP) set out how they will meet their duties under the Equality Act 2010 including as this relates to gender reassignment and sexual orientation	Medium term	Welsh Government
Take account of intersectionality in supporting all staff, students and visitors to the institution	In developing and reporting on strategic equality planning	HEFCW
Improve data collection and analysis to take account of intersectionality and inform policy and actions	Report progress through strategic equality planning processes	HEFCW
Universities and colleges should ensure that, as they develop their strategic equality delivery planning and well-being, health and mental health strategy and implementation planning, they include actions to strengthen	Evidence actions through strategic equality planning and well-being and health strategies and	HEFCW

⁴ In the LGBTQ+ Action Plan medium/middle term means within the lifetime of the current Senedd.

Action and paragraph reference in this circular	When	Action expected by Welsh Government, HEFCW
preventative approaches to tackling violence, harassment and abuse of staff, students and visitors, in all its forms, regardless of identity	implementation planning.	
Universities should ensure their VAWDASV training programmes are rolled out comprehensively and effectively.	ongoing	HEFCW
Universities must take action to deliver the higher education-related actions set out in the Anti-racist Wales Action Plan within the timeframe set by the Welsh Government. Specifically, institutions must: <ul style="list-style-type: none"> iv. review existing recruitment policies and procedures through an anti-racist lens by September 2023; v. monitor and address inequalities, including pay disparities by September 2023; vi. achieve a race equality charter mark as a condition of funding within three years to embed anti-racism policies at all levels within the sector. Institutions must make a commitment to the charter by September 2023. 	September 2023	Welsh Government
Universities must collaborate with, and involve, students and unions as partners in the higher education-specific Anti-racist Wales Action Plan actions.	September 2023 and ongoing	HEFCW
Universities should: <ul style="list-style-type: none"> i. improve data collection and analysis to evidence effective practice and focus resources; ii. collaborate to share practice on: <ul style="list-style-type: none"> • engaging effectively with health boards and third sector organisations, including using agreed definitions of mental health to improve the communication of students' mental health support needs; • supporting the well-being and health of Welsh speaking students; • embedding early intervention and preventative approaches for staff and students such as, but not limited to social prescribing; 	From 2022/23 and ongoing as part of strategic equality planning and well-being and health strategy and planning.	HEFCW

Action and paragraph reference in this circular	When	Action expected by Welsh Government, HEFCW
iii. continue to impact assess their policies and plans to take account of staff and student well-being and health, including mental health, and impacts on people who may experience discrimination or disadvantage and/or because of protected characteristics.		

Invitation to engage with us on supporting equality and diversity in higher education

38. As we move towards the Commission for Tertiary Education and Research becoming operational in 2024, HEFCW is undertaking its role to fund, regulate and influence with a view to how in due course policy may need to be revisited in the context of the wider post-16 tertiary sector. We recognise that the delivery of the outcomes outlined in this circular will fall beyond the lifetime of HEFCW, but action towards them needs to be taken now. We continue to welcome advice on all aspects of our equality and diversity policy developments. We can be contacted using the email addresses on the circular cover and below, or through info@hefcw.ac.uk.

Further information

39. For further information, contact jane.johns@hefcw.ac.uk, ryan.stokes@hefcw.ac.uk

Assessing the impact of our policies

40. We have carried out an impact assessment screening on our strategic equality planning processes and on individual policy areas referred to in this circular. Our impact assessment is an ongoing process to help safeguard against discrimination and promote equality. We have 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 HEFCW using the email addresses in this circular for more information about impact assessments.

**Welsh Government (WG) Anti-racist Wales Action Plan
Themes, goals and actions for HEFCW and higher education.
Mapping actions and monitoring progress**

HEFCW’s progress against Action Plan goals and actions indicated as follows:

Actions complete	✓
Actions ongoing	➤

Section one below identifies where HEFCW and partners will lead. We recognise there are other areas where HEFCW and higher education are partners and others are responsible for leading delivery. We commit to work as partners to contribute to delivering these actions.

Section One

In the education section, in relation to higher education, from p. 39, the Welsh Government confirms its priorities which we will take into account in monitoring:

1. to expect every education institution to record effectively all incidents of racist abuse, discrimination and/or bullying; and to work with learners and staff to co-design more effective ways to respond to the issues raised. We also expect every institution to publish information on the progress made in developing such approaches, and the impact this is having on learners and staff, whether that be learner outcomes and/or levels of staff pay. The results should be made available in languages and ways that are meaningful to ethnic minority people.
2. to improve both the completeness and the use of data on ethnicity in education. We need to use data currently available more systematically. We also need to explore opportunities to link to other datasets, such as those on health and employment, to develop a fuller understanding of inequalities. We will also create more robust systems of data collection and reporting
3. [to] expect all HE institutions to achieve a race equality charter mark within three years, as a condition of funding.

Section one: actions where HEFCW will lead

Theme: Higher Education						
Goal: Staff and students can expect their experience of HE to be positive irrespective of their racial and ethnic background. (Page 44)						
Actions	Output	Impact	WG date to be achieved by	HEFCW/HE actions	Progress	Date HEFCW/HE actions to be completed/progress to date
Establish an anti-racism network across the HE sector	Sharing of good practice across HE institutions in addressing racial harassment and promoting anti-racist culture.	More rapid, sustainable progress towards improving the experience for staff and students.	By March 2023	HEFCW all-Wales race access and success enhancement programme led by Advance HE HEFCW grant fund Advance HE race equality network series	<ul style="list-style-type: none"> ✓ Race enhancement programme completed ✓ Contract confirmed 2022. Network seminar series begun February 2023 	<ul style="list-style-type: none"> ✓ Action complete Network established February 2023
Publish an annual race equality report and performance measures for the sector, including outcomes for	Report and measures are published.	Increased accountability for HE institutions with regard to anti-racism. More focused response to issues affecting Black, Asian and Minority Ethnic	By March 2023. Annual report from 2023	Analyse data and publish report	<ul style="list-style-type: none"> ➤ Report drafted following consultation 	On track - Annual race equality data report to be published March 2023 and annually thereafter.

students and staff.		staff and students, including attainment gaps for students from different ethnic backgrounds.				
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Theme: Higher Education

Goal: Better use of levers available to promote anti-racist culture in higher education (page 45).

Actions	Output	Impact	Date to be achieved by	HEFCW/HE actions	Progress	Date HEFCW/HE actions to be completed/progress to date
Require HEFCW to expect all HE institutions to review existing recruitment policies and procedures through an anti-racist lens.	Senior leaders adopt a whole institution anti-racist approach.	Increased ethnic minority representation in senior positions within higher education.	By September 2023.	HEFCW 2022/23 race equality monitoring to include expectation to monitor policies through anti-racist levers	➤ Publish 2022/23 race equality monitoring guidance	On track – Guidance to be published March 2023
Require HEFCW to expect HE institutions to	Publication of data on HE staff pay for different ethnic groups.	Greater transparency in pay data to support increased pay equality for	By September 2023.	HEFCW 2022/23 monitoring guidance to expect	➤ Publish race equality monitoring guidance 2022/23	On track – publish guidance March 2023

<p>monitor and address inequalities, including pay disparities.</p> <p>Expect all HE institutions to achieve a race equality charter mark as a condition of funding within three years to embed anti-racism policies at all levels within the sector.</p>	<p>All HE institutions to achieve a Charter Mark.</p>	<p>staff regardless of racial background.</p> <p>Whole-institution, open, commitment to anti-racist approach which will benefit all students and staff.</p>	<p>Commitment to Charter Mark by September 2023.</p>	<p>institutions to report on monitoring and addressing inequalities including pay disparities.</p> <p>HEFCW set out expectations to achieve a race equality charter in circular W22/05HE and will reaffirm this in 2022/23 funding guidance</p>	<p>including pay inequality actions, republish equal pay guidance</p> <p>✓ 2021/22 and 2022/23 funding guidance reaffirms Charter Mark expectations by 2025</p>	<p>On track - Published our charter expectations March 2022 and July 2022. Charter Mark to be achieved by 2025</p>
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Responses to HEFCW's consultation on race equality monitoring data

1. This annex provides a summary of responses to a [consultation on monitoring race equality in higher education \(W22/28HE\)](#) published in August 2022 on our proposed approach to monitoring race equality in higher education. We have, and will continue to, take account of the responses as and when we can, including in future publications. We received eight responses.

Monitoring approach and data

2. In response to the questions on the overall approach to monitoring and data sets:
 - four institutions agreed with the overall approach to monitoring with no further comment
 - four institutions agreed in principle to our approach to monitoring and provided a few additional suggestions, including on student data in terms of their use at a institutional level, as well as agreeing that attainment gaps at first class and 2:1 degree classifications should be taken into account.
 - another four institutions agreed with proposed data sets to be used in the monitoring.
 - one institution suggested that monitoring degree outcomes could miss the “lived experience” of students within these groups for many of whom a successful outcome may not necessarily be related to the achievement of a 2:1 or first”.
 - one institution disagreed with our approach as it relates to using UCAS data to make a comparison between application and enrolment data as it would not provide an accurate reflection of the variety of models used in the sector to recruit students.
 - three other institutions raised concerns that the use of UCAS data would not be effective at institutions that used a number of different recruitment modes.

Student and staff data

3. All institutions made suggestions relating to student and staff data which included:
 - taking an intersectional approach to monitoring which recognises the multiple identities of students and staff, including using widening access categories or a range social identifiers to explore any intersections between groups.
 - for students, disaggregating the ethnic minority categories as significant differences between ethnic groups are masked by aggregation.
 - including all graduate degree classifications.
 - considering that success in a number of other indicators that may not be related to degree classification achievement;
 - explaining the rationale for offer rate data which relates largely to 18 year old applicants and considering how to capture applicant data for 18 – 21 year olds and mature student applicants.
 - including an additional indicator of staff retention.
 - using student satisfaction data.

Academic and professional service staff

4. Five institutions agreed to our approach of separating academic and non-academic staff and grouping them by staff grade. Three institutions provided additional feedback on this and:
 - noted that the Office for Students' proposal not to collect non- academic staff data in future may result in HESA data not being useable in any meaningful way.
 - suggested additional staff groupings to show differences at the lower end of the grade structure.
 - requested an additional written commentary of work taking place to address any notable differences.
 - considered that working life experiences within universities would vary according to the options available to them in terms of their personal circumstances including housing and accommodation and their ability to respond to the current cost of living crisis. Living arrangements may also impact colleagues' ability to pursue hybrid working and introduce a disparity in access to well-being benefits.

Welsh Language

5. Seven institutions did not anticipate any adverse effects on the Welsh language. One institution noted risks of data disclosure issues, given the small numbers of staff from Black, Asian and Minority Ethnic students and staff with Welsh language skills.

Race equality data monitoring

HEFCW consulted on the monitoring areas through circular [W22/28HE: Consultation on monitoring race equality in higher education](#). We took account of consultation feedback and we will publish annually Wales-wide level staff and student sector-level data as follows:

- i. Applications - The number, proportion, annual percentage change in number and annual percentage point change in the proportion, of UCAS applications to full-time undergraduate courses at Welsh HE providers from Asian, black, mixed, white and other ethnic backgrounds.
- ii. Applicants - 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 at Welsh HE providers from Asian, black, mixed, white and other ethnic backgrounds.
- iii. Offer rate - The unexplained gap between the offer rate for UK domiciled applicants to undergraduate courses for full-time UCAS applicants from Asian, black, mixed, white and other ethnic backgrounds.
- iv. Placed applicants - 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 at Welsh HE providers from Asian, black, mixed, white and other ethnic backgrounds.
- v. Entrants - The number, proportion, annual percentage change in number and annual percentage point change in the proportion, of UK domiciled entrants to full-time and part-time undergraduate courses at Welsh HE providers from Asian, black, mixed, white and other ethnic backgrounds.
- vi. Retention - The unexplained gap between the proportion of entrants from Asian, black, mixed, white and other ethnic backgrounds who are present in higher education at Welsh HE providers:
 - a) one year following year of entry for full-time undergraduate UK domiciled entrants; and
 - b) two years following year of entry for part-time first degree UK domiciled entrants.
- vii. Degree outcomes - The unexplained gap in degree outcomes between students from Asian, black, mixed, white and other ethnic backgrounds, for UK domiciled students studying full-time and/or part-time – all classifications firsts to unclassified.
- viii. Staff - The number, proportion, annual percentage change in number and annual percentage point change in the proportion, of staff from Asian, black, mixed, white and other ethnic backgrounds - academic non-atypical, academic atypical, non-academic contracts.
- ix. Staff terms of employment - The unexplained gap between the proportion of staff from Asian, black, mixed, white and other ethnic backgrounds on permanent terms of employment – academic, non-academic.

- x. Staff grade - The unexplained gap between the proportion of staff from Asian, black, mixed, white and other ethnic backgrounds in each grade group – academic non atypical, academic atypical, non-academic.
- xi. Governors - The number and proportion of governors from Asian, black, mixed, white and other ethnic backgrounds.