London South Bank University

Equality Impact Assessment – Post REF2014 Report

This Equality Impact Assessment (EIA) follows London South Bank University (LSBU) submission to the Research Excellence Framework 2014 (REF2014) in November 2013. Its purpose is to assess the consistency, rigour and delivered outcomes of the selection processes employed by the University against the four principles of Transparency, Consistency, Accountability and Inclusivity.

In particular, the EIA seeks to assess the cumulative impact of LSBU's REF2014 selection processes across protected characteristics defined by the Equality Act 2010 and, where appropriate make recommendations for action.

The REF selection processes adopted by LSBU are encapsulated within the University's Code of Practice for the Selection of Staff for Submission to REF2014. The Code is recognised as a policy with high Equality, Diversity and Inclusion (EDI) relevance with potential for differential impact and ability to affect minority groups. It aligns with the University's policy on EDI (Appendix 1).

The findings from this report will inform and further promote good practice and relations in developing the University's research strategy and environment.

The report presents:

1. An analysis and comparison, relative to RAE2008, of staff selected and submitted to REF2014, including data on protected characteristics;
2. An assessment of the effectiveness of steps taken following the 2008 exercise to promote equality and address identified EDI issues;
3. An assessment of the impact and effectiveness of the University's Code of Practice in relation to the selection of staff for submission to REF2014.
4. Conclusions based upon the analysis together with recommendations as to how any identified EDI issues can be addressed.

1. Analysis and Comparison of REF2014 Staff Data vs RAE2008:

1.1 General:

Although LSBU submitted fewer Units of Assessment (7 vs 9) than in 2008, the total number of staff returned increased by 22%, to 116 headcount (101.65fte). This increase was influenced by the changed eligibility criteria for REF2014 which allowed staff with defined and/or complex circumstances to be submitted with fewer than four research outputs.

The overall proportion of LSBU staff submitted to REF2014 was 17.7% of the University's total REF-eligible staff complement (656 headcount). Although higher than the 14.2%, (95 headcount) in 2008, it is well below comparable data for the 2001 RAE (24%, 194 headcount). The reduction in numbers since 2001 reflects the increasingly selective research funding model adopted by HEFCE which has led to more rigorous staff selection policies within many universities.

The average age of staff submitted to REF2014 was 48, down from 52 in 2008. This is seen as a desirable shift away from an over dependence on staff aged 55 and over, a factor that was highlighted following our RAE2008 submission.

The following summarises the changes in relation to specific staff categories and staff across Protected Characteristic groups:

1.2 Gender:

The number of female staff submitted in 2014 increased by 17% (54 from 45) reflecting an overall increase in REF-eligible female employee numbers since 2008. Overall, the percentage of female staff returned to REF2014 remained constant at 47% of all staff returned, slightly below the female make up for the University as a whole (52%). However, given the balance and nature of LSBU academic disciplines, we do not consider this be surprising or particularly significant.

Table 1: Gender Balance – 2014REF vs RAE2008

	RAE 2008	REF2014
Total eligible staff (h/c):	668	656
Gender:		
Male	345 (52%)	315 (48%)
Female	323 (48%)	341 (52%)

	RAE 2008	REF2014
Total staff (h/c) returned:	95 (87.0fte)	116 (101.65fte)
Gender:		
Male	50 (52%)	62 (53%)
Female	45 (48%)	54 (47%)

1.3 Part-Time Employees:

LSBU returned 24 part-time staff (21% of all staff returned) to the REF. This is in line with the proportion of REF-eligible part time employees across the University as a whole (153 (23%). Of those submitted two thirds were female reflecting the high proportion of part-time female staff in the specific UoAs of Allied Health Professions & Nursing and Social Policy.

1.4 Age: (Action area from Post-RAE2008 EIA).

On the REF2014 census date, LSBU employed 52 staff (8% of all REF-eligible staff) under the age of 35. Of these, 12 (10% of all staff returned) were submitted to REF, including five as Early Career

Researchers. This represents a significant shift from 2008 when just 2% of LSBU staff returned to RAE2008 was from this age bracket. An important factor contributing to this desirable change was the introduction in 2009 of the Research Opportunities Fund (ROF) initiative which provided funding to staff in this age bracket to enable them to develop their research capability and capacity (see section 2). 50% of staff under 35 returned to REF was female.

The proportion of staff aged 35-44 returned to REF was also above the overall University proportion for this age band (28% vs 19%).The 45-54 band was in line with the University figure (40%).

A consequence of the above was that the proportion of older (55+) staff making up the LSBU REF2014 submission fell significantly (52% in 2008 to 21% in 2014). The retirement of a number of a number of senior researchers after RAE2008 and replacement with younger staff also contributed to this change. Although at 21% this age group is now technically under-represented in REF relative to the 34% for all REF-eligible staff we view this rebalancing of the age range spread as desirable.

Table 2:   Age Range Profile – REF2014 vs RAE2008

Age Band:	<35	35-44	45-54	55+
RAE2008	2%	21%	25%	52%
2014REF	10%	28%	41%	21%
All REF2014 eligible	8%	19%	39%	34%

This addresses the previous disproportionality around staff under the age of 35 identified in the post-RAE2008 EIA.

1.5 Race: (Action area from Post RAE2008 EIA).

The number and proportion of staff classified as BAME returned by LSBU to REF2014 significantly increased (31 (27% of all staff returned)) relative to 2008 (13 (14%)). The former represents a higher proportion of BAME staff than across the University as a whole (22%). Part of this can be ascribed to the recruitment of senior BAME staff, notably in Engineering, following the 2008 exercise.

Table 3: Proportion of BAME Staff – 2014REF vs RAE2008

	RAE 2008	REF2014
Total BAME eligible staff:	126 (19%)	142 (22%)
BAME:		
Male	78 (12%)	83 (13%)
Female	48 (7%)	59 (9%)

	RAE 2008	REF2014
Total BAME returned REF:	13 (14%)	31 (27%)
BAME:		
Male	7 (7%)	20 (17%)
Female	6 (7%)	11 (10%)

This addresses the previous disproportionality with BAME staff identified in the post-RAE2008 EIA.

1.6 Disability:

On the REF census date, LSBU employed 40 (6%) of REF-eligible staff with a declared disability. Of these, just 3 (3% of staff submitted) were included in the University's response to REF2014. Although relatively small numbers, this is an area that should be examined in more detail to understand why such a pronounced under representation of staff with disabilities in LSBU's REF2014 submission exists.

1.7 Other Protected Characteristics.

No meaningful data is available on other Protected Characteristics, viz. gender reassignment, religion or belief, or sexual orientation.

1.8 Additional Data.

The figures reported above reflect aggregated staff numbers returned by LSBU to REF2014 relative to those for the University REF-eligible population as a whole.

Appendix 2 provides a full breakdown of all the data relating to LSBU REF-eligible staff numbers and those submitted to REF2014, by gender, part-time employment, disability, BAME and age band profile and by UoA.

2. Assessment of EDI Measures taken Post-RAE2008.

Two important EDI concerns were identified in the post RAE2008 EIA: (i) the low proportion of staff under the age of 35 in the LSBU submission; and (ii) the under-representation of BAME staff, both measured against the University population for these groups.

A specific scheme, the Research Opportunities Fund (ROF) was introduced in 2009 to address this age disproportionality issue. This initiative provided funds (£275K) to encourage and support younger staff develop their research interests, portfolio and standing. 70% of those who received support were under 35 at the time of their award. Approximately two thirds of those who received ROF support were included in LSBU's REF2014 return. Together with the REF criteria which encouraged staff with Defined Circumstances and specifically Early Career Researchers, we believe that the ROF initiative played an important part in increasing the number and proportion of younger staff submitted by LSBU to REF2014.

Although no specific policy change was introduced in response to the under representation of BAME staff, this matter has been addressed indirectly through recruitment procedures.

3. Impact of the Code of Practice.

The University's Code of Practice on the Selection of Staff for Submission to the REF2014 was developed on the back of the Code adopted for the RAE2008 exercise and in response to: (i) HEFCE'S

requirement for all universities to have such a policy in place ahead of REF2014 exercise, and (ii) the finding from the post-RAE2008 EIA. It has been further refined in the light of initial Mock Research Audits carried out in 2012 and 2013 with the aim of ensuring the policy remained inclusive, fair and accessible to all REF-eligible staff. This version (Version 3) reflects the latest data available.

An EIA on this latest version of the University's Code of Practice, carried out in November 2013 is provided in Appendix 3.

Implementing the Code has proved effective in:

(i)   Encouraging staff to put forward research outputs for REF consideration.
(ii)   Encouraging staff with defined/complex circumstances to make such circumstances known for consideration.
(iii)   Making LSBU's objectives, criteria and processes for REF clear to all staff.
(iv)   Providing a clear framework against which staff research outputs would be considered.
(v)   Making it clear to all staff which individuals/groups are responsible for selection and how and when this will be carried out.
(vi)   Providing information on REF and feedback to staff at key times.
(vii) Driving forward procedures and mechanisms for dealing with disputes, staff circumstances and appeals.

Overall, 225 LSBU staff (34% of all REF-eligible staff) submitted research outputs for consideration for REF. These were assessed through a combination of Mock Audits and internal expert assessment. Based upon research quality considerations 116 staff was submitted to REF2014.

75 Staff (11%) submitted Staff Circumstances forms. 52 of these were accepted for reduced research outputs by the University Staff Circumstances Group and put forward for consideration to those responsible for compiling individual UoA submissions. Of these, 38 (73%) involved defined circumstances of part time working (25) or maternity leave (13) or a combination of both. 5 (10%) involved complex circumstances and 8 (15%) related to Early Career Researchers.

No appeals were received from staff on grounds of being omitted (or indeed included) from LSBU's REF submission. Neither was any appeal received against decisions made by the Staff Circumstances Group on individual reduced outputs.

4. Overall Conclusions and Recommendations:

Conclusions:

1. The balance across the various groups submitted to REF2014, including those in a number of important protected characteristics (where data is available) is much improved, relative to RAE2008.
2. The broadened eligibility rules for REF, permitting staff with defined and complex circumstances to be included with fewer than 4 research outputs was a significant factor in this. In particular, in LSBU's case it allowed a significant proportion of staff who had taken periods of maternity leave and who worked part-time to be included with fewer research outputs without penalty.

3. The proportion of REF-eligible female and part-time staff returned to REF2014 is broadly in line with the numbers for these groups respectively across the University as a whole.
4. Measures introduced after the RAE2008 to support staff under 35 to become more research active ahead of REF, have contributed to the higher number and proportion of such staff returned in 2014.
5. The proportion of staff with a declared disability who were submitted to REF2014 is well below that for the University as a whole and is an aspect of the LSBU submission that needs to be assessed further to establish the underlying reasons.
6. The number and proportion of BAME staff returned to REF2014 shows a significant increase from the low levels of RAE2008, and now exceeds the share of such staff within the wider University population.
7. The requirement to produce a Code of Practice on Selection of Staff for Submission to the REF2014 and to carry out EIA at key stages has resulted in a considerably enhanced awareness of EDI and Protected Characteristics amongst the University's senior management and research fraternity. This has arisen both from the need for specific training on EDI policy as it applies to REF2014 and from the direct involvement in REF selection process.

Recommendations:

Based upon data collected and analysed for this EIA report the following steps aimed at further improving the Code of Practice and addressing identified EDI matters are recommended; that:

1. A broad-ranging review is conducted to gather and analyse the opinions of all involved in and affected by the REF2014 Selection Policy; that any improvements required are incorporated in to the Policy in good time for the next REF exercise.
2. The University explores ways of capturing data across those protected characteristics for which no meaningful data was available for this report; that it prepares an annual report providing details of all protected characteristics.
3. That a more detailed assessment is carried out looking into the reasons for the proportion of disabled staff being much lower than that in the wider University population as a whole

London South Bank University

Equality, Diversity and Inclusion Policy

Introduction

London South Bank University is committed to the provision of equality for all, valuing diversity across all the dimensions of difference. This is set out in the University's Equality and Diversity Policy Statement.

In the furtherance of this objective, the University has developed this Equality, Diversity and Inclusion Policy including procedures to be followed in implementing them, to ensure everyone who studies and works here does so free of discrimination.

This document was first produced in 1996 with full consultation with staff, students and trade unions. Copies were circulated to all staff and also made available to students via the Student Union as well as making reference to it in the Student Handbook. The document was revised in October 2000 and again in May 2002, the latter to take account of changes in legislation with the introduction of the Race Relations (Amendments) Act (2000) and the Special Educational Needs and Disability Act (2001). This new version has been up-dated to reflect and include the Equality Act 2010.

This latest version of the document now includes recent legislation on the nine 'protected characteristics' and will be made available on the University's website.

Vision, Aim and Approach

Our Vision

We are a unique educational institution that is proactively committed to creating a stimulating teaching and learning environment that values diversity, fairness, mutual respect and inclusion. We are dedicated to realising the potential of our staff, students and local community we believe that diversity enriches our individual and collective experience, performance and achievement.

Our Aim

Our aim is to set objectives, milestones and targets to:
- Develop diversity and inclusion as a widely recognised area of competitive strength.
- Effectively integrate and mainstream diversity and equality into our corporate strategies, policies, academic curriculum, teaching delivery, assessment methods, learning environment and management practice.
- Continue to be at the forefront of the access and widening participation agenda.
- Create an inclusive environment where differences are celebrated and everyone is valued and respected

The drive and commitment to diversity and equality at the University will ensure that:

- We are adequately equipped to meet the diverse needs and aspirations of staff, students and wider community.
- We create an inclusive environment that promotes dignity at work and mutual respect.
- We set the standard within higher education and are recognised as an example of Equality, Diversity and Inclusion (EDI) good practice.

The University is committed to equality of opportunity both as an education institution and as an employer. Equality of Opportunity means working to ensure that no student or member of staff receives less favourable treatment on the grounds of race, gender, age, disability, marital status, sexual orientation, gender-reassignment, pregnancy and maternity and religion or belief.

In complying with the Equality Act 2010, the University will:

- Promote good relations among its staff and students and will create conditions which contribute to the full development and potential of everyone.
- Create a climate where staff and students are given confidence to challenge acts and behaviour which contravene the University's Equality, Diversity & Inclusion Policy and the law.
- Treat fairly and appropriately each job applicant, course assessment, progression or promotion decisions at the University.

Definitions

- Equality is about creating a fairer society where everyone can participate and has the same opportunity to fulfil their potential. Equality is backed by legislation designed to address unfair discrimination based on membership of a particular protected group

- Diversity comprises of a mosaic of people from all walks of life, who bring a variety of backgrounds, styles, perspectives, values and beliefs as assets to all those with whom they interact

- Inclusion is the complete acceptance and integration of all students and employees regardless of diversity background that proactively leads to a sense of belonging, engagement and full participation within and across the University

Legislation
The majority of the Equality Act provisions became law in October 2010. It replaces previous legislation (such as the Race Relations Act 1976 and the Disability Discrimination Act 1995) and ensures consistency in what public sector organisations need to do to make the workplace a fair environment and to comply with the law.

The Act is intended to simplify, strengthen and harmonise the current legislation and to provide the UK with a new discrimination law that protects individuals from unfair treatment and promotes a fair and more equal society.

The Act streamlines discrimination law, making it easier for people to understand their rights and responsibilities. In addition, the Act contains wide positive action provisions which offer special encouragement to those from disproportionately under-represented or otherwise disadvantaged groups.

The nine main pieces of legislation that have merged are:

- the Equal Pay Act 1970
- the Sex Discrimination Act 1975
- the Race Relations Act 1976
- the Disability Discrimination Act 1995
- the Employment Equality (Religion or Belief) Regulations 2003
- the Employment Equality (Sexual Orientation) Regulations 2003
- the Employment Equality (Age) Regulations 2006
- the Equality Act 2006, Part 2
- the Equality Act (Sexual Orientation) Regulations 2007

The protected characteristics are Race, Age, Disability, Sex, Gender reassignment, Marriage and civil partnership, Pregnancy and Maternity, Religion and Belief and Sexual Orientation.

Other Key Provisions of the Equality Act

The Public Sector Equality Duty requires Universities to have due regard to the need to:
⬜ Eliminate discrimination, harassment and victimisation
⬜ Advance Equality of Opportunity
⬜ Foster good relations

Positive Action provisions also permit the University to take proportionate action to overcome disadvantage, meet needs and tackle under representation.

Our Approach

We have adopted a comprehensive approach that seeks to embed equality, value the multiple dimensions of diversity and mainstream inclusion. This means that we are committed to ensuring that this agenda is fundamental to the development and delivery of our policies and effectively integrated into the very fabric of our professional practice and service delivery.

Leadership and Management
The University's Board of Governors, Executive Team, and the Senior Management Group will set the pace providing leadership at all levels to champion equality, diversity and inclusion, monitor progress against planned activities and respond effectively to the University's statutory requirements and legal obligations.

Access and Inclusive Learning
The University will provide an accessible environment for people with disabilities and from different cultures to study and work. Applications from groups currently under-represented in higher education will be positively encouraged.

Staff Development and Training
Equality, diversity and inclusion training in relation to legislation, employment, leadership, the student experience; cultural competence and how to put equality and the core principles of diversity into practice will be provided for all employees. In accordance with the Single Equality Act, positive action may be used as a vehicle to address under-representation.

All employees will be given equal access to staff development, and where appropriate additional development, to enable them to fulfil their potential and to progress within the organisation.

Curriculum and Skills Development

Students will be educated for life and work in a global, multi-cultural society. The University will promote understanding, pay due regard and respect for all cultures. All students will be given the opportunity to develop further their skills to enhance their employability and progression opportunities when leaving the University.

The Student Experience

The University is committed to:

- Ensuring and promoting equality through teaching and learning, and also in the selection, enrolment, assessment and progression of students.
- Providing appropriate student support and guidance which reflects the diversity of students' needs both pre-entry and on-course.

This means that no student will receive less favourable treatment on grounds of race, sex, age, race, disability, gender reassignment, maternity, marital status, sexual orientation, care responsibility, or religious belief. Support and guidance for students will be linked to their particular needs.

It also means the University aims to promote equal respect for all people, to challenge prejudice and to prepare students to work in a multicultural and diverse society.
Selection, assessment and progression will be kept under review to ensure that individuals are selected and treated only on the basis of their relevant merits and abilities.

Publicity and Promotions Policies

The University seeks to ensure that publicity and promotion practices encourage applicants from under-represented groups. There is careful scrutiny of publicity and promotion materials and marketing related activities to ensure that brochures, advertisements, applications forms and display materials reflect the diversity of students at the University.

This means materials do not contain socially, racially biased or stereotypical terminology, information or illustrations which contravene this policy. It also includes a proactive approach towards marketing courses to under-represented groups which is designed to enhance the overall image of the University as an institution with a determination to reflect and implement its EDI commitment. We will also provide impartial guidance to all applicants so that they are placed on the best courses to help them succeed. Publicity and promotion of the University to students may include:

- Developing entry criteria which is clear and does not discriminate unfairly by, for example, only referring to traditional entry qualifications.
- Placing advertisements in non-traditional outlets.
- Establishing links with the publicity networks of local community groups and other organisations.
- Developing progression partnerships with local schools and FE colleges.
- Providing detailed information about the range of opportunities open to mature people without traditional entry requirements, which makes explicit the criteria and procedures for entry.

- Undertaking monitoring exercises on the above to determine the most effective means of contacting people from under-represented groups.

Access and Educational Opportunities for Under-Represented Groups

The University is committed to working towards providing additional educational opportunities for under-represented groups. Methods to achieve this aim may include the following:
- An increase in the number of courses designed to be particularly attractive for these groups, taking advantage wherever possible of any external funding available and working closely with local and national bodies, which seek to extend educational opportunities for under-represented groups.
- An increase in the number of routes to improve access into existing provision in partnership with local schools and FE colleges.
- Moves towards greater diversity in course structure, including an extension of short course, part-time and evening provision, and the creation of more flexible learning opportunities so that students can vary their pace of study.

Admissions Policy

On courses where particular groups are significantly under-represented, the University will seek to identify the cause and to take positive action.

To assist in this process, course or subject teams will need to:

- Monitor the profile of entrants to their programmes.
- Identify the nature and cause of significant under-representation within their student intake.
- To develop recruitment policies designed to attract groups that are currently under-represented.
- To ensure that admissions tutors make explicit their criteria and procedures for entry of 'non-traditional' as well as 'traditional' applicants and that they endeavour to identify study potential in the absence of conventional indicators as examination results.

The University will ensure that the application procedures and criteria for non-traditional entry to particular courses are explicit and made available to the general public. It will also ensure that this information is collated across the University in order to obtain an overall picture of developing practice.

Student Support

In the organisation and resourcing of its support services the University will make every effort to meet the needs of students who, as an outcome of race, sex,, gender re-assignment, age, disability, pregnancy and maternity, religion and belief or sexual orientation, may find particular difficulties related to their academic or vocational work or other aspects of their lives in the University.

The network of care in the University will link up the specialist services provided by the Student Centre which provides personal development advice unit, core skills, careers and employment service with the system of support in Faculty's and the services of the Student Union.

The University will seek to ensure that the general facilities and services to students – e.g. halls of residence, canteens, libraries and the learning resource centre, are appropriately designed to meet the needs of a culturally diverse student body and that they are also accessible to students with disabilities.

With an ageing population, and an increase in the number of students with children, the University recognises the care responsibilities that students have, which are viewed as the role for both men and women, and takes into account the specific challenges that care responsibilities bring and the impact they may have on attendance, learning and academic performance.

The University offers bursaries, scholarships and other financial assistance to ensure we meet the needs of our students and continue our commitment to widening participation.

Curriculum Development Policies

The University is committed to a curriculum development policy, which furthers its equality, diversity and inclusion commitment with respect to both the content, presentation and delivery of academic courses. The implementation of a curriculum development policy requires monitoring, scrutiny, and where necessary revision, of internally validated course submissions, unit guides and associated assessments to ensure that they do not promote discriminatory terminology, stereotypes, information or concepts.

Where possible the curriculum will promote equality, diversity and inclusion and will prepare students for a global multi-cultural society by promoting understanding and respect for all cultures and by encouraging tolerant discussion of a range of political beliefs and religious conviction. Where relevant, the curriculum will expose students to cases and methodologies that incorporate variations by gender, race, ethnicity, sexuality, disability and religion.

The curriculum development policy will include:

- The development of alternative full-time and part-time forms of study mode which would have the advantages of shorter-term objectives and transferability (to other courses) for those who may find difficulty in committing themselves initially to three or more years of study.

- A variety of modes of assessment to enable students to demonstrate a variety of skills and areas of comprehension, for example: projects, course work, seminar papers, open book exams, objective response exams, as well as or instead of the traditional essay or written examination. Assessment criteria will be fair and transparent.

- Dissemination of good practice from both within the University and from external agencies in the development of curriculum which promotes equality, diversity and inclusion (for example, the Good Practice Guide from the HEFCE, Equality and Human Rights Commission and the Equality Challenge Unit).

- An approach to teaching which recognises that an appreciation of students' diversity, cultural background and individual learning style is an essential element of any approach to academic delivery.

- Pro-active due regard to the principles of inclusive teaching to encourage the creation of a stimulating learning environment where all students, regardless of their backgrounds are given the opportunity to realise their full potential and enhance their employability.

- Staff development will be undertaken to promote inclusive learning and the management of the learning environment for a diverse group of students.

Equality Impact Analysis will be used as an important mechanism to ensure that curriculum development policy does not have a differential negative impact on minority groups.

Equality and Diversity for Staff

The University is committed to equality of opportunity, valuing diversity and promoting inclusion. As an employer the University will ensure that no applicant for a post or existing employee receives less favourable treatment on the grounds of their Race, Age, Disability, Sex, Gender Re-assignment, Marriage, Civil Partnership, Pregnancy and Maternity, Religion and Belief or Sexual Orientation
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Recruitment and Selection

The commitment to Equality, Diversity and Inclusion underpins the University staff Recruitment and Selection Policy. Through the use and application of training and monitoring, the University is committed to ensuring that these recruitment and promotion procedures are kept constantly under review in order to ensure that individuals are selected for interview and appointed to posts on the basis of their ability to do the job required.

The University will use published, objective and job related criteria when making decisions on recruitment, remuneration, training, promotion and termination of employment. Where possible barriers to equality of opportunity will be identified and positive action taken to address them by for example, targeted training and development.

Staff Development on Equality, Diversity and Inclusion

The Human Resources Department are responsible for ensuring the implementation throughout the University of training, education and information for staff on equality, diversity and inclusion legislation, policies and best practice.

All managers responsible for training and development of staff should ensure that all opportunities are allocated objectively, fairly and without discrimination. This includes in-house events and external training, staff sabbaticals, secondments and sponsored study.

All training and development events for staff will include an equality, diversity and inclusion dimension where appropriate.

Delivering an Inclusive Environment

The University will provide an inclusive environment that promotes equality of opportunity and diversity and is free from unlawful discrimination, harassment or victimisation of any kind. All staff (including staff employed by agencies for contracted out services), students and

other users of the University services will be made aware of behaviour which amounts to discrimination, harassment or victimisation and that such behaviours may result in disciplinary action and/or amount to a criminal offence.

The University will do this by:

- Taking appropriate action against any student or member of staff who does not comply with the policy. The University has engaged in disciplinary action against both staff and students who have breached the University's Equality, Diversity and Inclusion Policy and in some cases this has led to permanent removal from the University.
- Ensuring promotional and teaching materials present appropriate and positive images relating to all the dimensions of diversity and equality.
- Ensuring Governors and Staff have access to comprehensive information to assist them in planning, putting into practice and monitoring their responsibilities under the Equality, Diversity and Inclusion Policy.
- Striving to challenge behaviour which does not accord with the University's Equality, Diversity and Inclusion Policy. Considering appropriate measures to overcome under-representation in particular jobs or education identified by the monitoring and impact assessment processes.
- Responding positively and competently when issues relating to equality, diversity and inclusion are discussed. Ensuring that all students and staff know how to raise complaints and that the University provides a timely and sensitive response.

Complaints

If a member of staff or a student believes that they have been discriminated against, they should seek the advice of their Human Resources Business Partner in the case of a member of staff or the Student Relations Officer in the University Secretary's Office.

All complaints from staff concerning bullying should be raised under the University's Staff Inclusion Policy. Other complaints concerning unfair treatment within the scope of this Equality, Diversity and Inclusion Policy should be raised under the Students' Complaints Procedure or the Staff Grievance Procedure.

Responsibilities for Equality and Diversity

It is unlawful for anybody to discriminate on the grounds of Race, Age, Sex, Disability, Gender Reassignment, or Marriage or Civil Partnership, Pregnancy and Maternity, Religion or Belief or Sexual Orientation. Responsibilities for approving and monitoring this Policy lie with the Board of Governors and associated HR Committee.

Board of Governors
- To ensure that the University fulfils its legal responsibilities.
- To provide adequate scrutiny in monitoring the implementation of the policy and associated action plan.
- The HR Committee of the Board will monitor this policy in relation to university employees.

The Vice Chancellor and Executive Team

- To take responsibility for the implementation of the policy.

Senior Management Group

- To provide active visible leadership on equality, diversity and inclusion.
- To ensure that related aims and objectives of the Equality, Diversity and Inclusion Policy are effectively implemented.
- To ensure that all are aware of their individual and collective responsibility and accountability.
- The Director of Human Resources is responsible for drawing up an annual action plan and raising staff awareness of their responsibilities under equality, diversity and inclusion legislation.

Faculty & Operational Management

- Take ownership of equality, diversity and inclusion by implementing the policy and its related action plan.
- To ensure staff understand equality, diversity and inclusion issues and how to report any perceived discrimination or unequal opportunity and that all training and development opportunities are allocated objectively, fairly and without discrimination.

Staff

- To practically demonstrate the core principles of equality, diversity and inclusion by treating others with dignity and respect.
- To effectively identify and challenge discriminatory behaviour and attitudes.
- To speak out and report if they witness or are a victim of any form of discrimination, bullying, unfair treatment or harassment.
- To maintain an awareness of equality legislation by attending staff development programmes.
- To actively participate and contribute to creating an inclusive learning environment that values difference.
- To ensure that equality and diversity is effectively integrated into the professional practice of teaching, research and service delivery.

Students

- To speak out, or report it, if they witness or are aware of discrimination, bullying, unfair treatment or harassment and not assume that it is someone else's responsibility.
- To effectively challenge any form of discrimination.
- To take equal responsibility in ensuring that we create a learning environment where people are valued and respected.
- To express opinions constructively with sensitivity and respect.

Service Providers

- Service providers working in University premises are expected to act within the requirements of the law and the terms of the University's Equality and Diversity and Inclusion Policy

Support Infrastructure

The Equality and Diversity Team is part of HR and is responsible for providing expert guidance, advice and management support at a strategic and operational level across the University and disseminating good practice.

Monitoring

Monitoring of the effectiveness of the policy will take place on an annual basis and a report of the results made available across the University. The results will inform corporate decision making through the Board of Governors, Academic Boards and Executive Management Team.

The University is committed to devising and implementing appropriate methods of monitoring and evaluation of the University's Equality, Diversity and Inclusion Policy. The University will produce statistical analysis which will help to identify and to diagnose problems. This will enable the monitoring of the effectiveness of the University's Equality, Diversity and Inclusion Policy and identify actions that will make the implementation of the Policy more effective.

In order to provide essential statistical information, monitoring and evaluation will include:

- People making applications to the University for employment will be requested and encouraged to indicate their ethnic origin, gender, age, sexual orientation, disability, religion and belief as perceived by themselves. The same applies to existing staff.

- As part of the enrolment process, students will be requested and encouraged to indicate Race, Gender, Age, Sexual Orientation, Disability and Religion and Belief. Faculty's will monitor admissions to their courses as part of the annual monitoring process and will consequently review their admission practices annually in the light of their student intake and make recommendations accordingly.

Data relating to students' admission and progression will be produced at Faculty and course level by the Registry.

Monitoring of curriculum development policy will be evaluated through the University's validation and review procedures.

Student Services will monitor by Race, Age, Disability, Sexual Orientation Gender and Religion & Belief of use by students of its services.

Student opinion on the effectiveness of the University's Equality, Diversity and Inclusion Policy will be obtained through the annual Student Satisfaction Survey.

Protected Characteristics Definitions

Age

Where this is referred to, it refers to a person belonging to a particular age or range of ages

Disability

A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's disability to carry out normal day-to-day activities. This has extended to cover people who have had a disability in the past.

Gender reassignment

The process of transitioning from one gender to another. The definition of gender re-assignment has been extended to cover people who have proposed, started or completed a process to change their sex but are not under medical supervision**.**

Marriage and civil partnership

Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.

Pregnancy and maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for six months after giving birth, and this includes treating a woman unfavourably because she is breastfeeding. After six months a breastfeeding mother is protected through the sex discrimination provisions in the Equality Act.

Race:

Refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Religion and Belief:

Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect life choices or the way a person lives for it to be included in the definition.

Sex :

A man or a woman.

Sexual Orientation:

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Information and Contact:

The Equality & Diversity Unit (EDU) has been established to facilitate and assist London South Bank University (LSBU) in realising its vision to become: *the University of Choice and centre of excellence for diversity and equality*. For further information and access to all our equality, diversity policies and action plans please visit us online: www.lsbu.ac.uk/diversity / or contact:

Equality & Diversity Unit

Phone: +44 207 815 6013
e-mail: de.admin@lsbu.ac.uk

Data on all REF2014-eligible staff and staff submitted to REF by category and UoA.

	All (h/c (fte))	Gender (h/c)	Gender (fte)	Part Time (h/c)	Part Time (fte)	Disabled (h/c)	Disabled (fte)	BAME (h/c)	BAME (fte)	<35	35-44	54-54	55+
		F (M)	F (M)	F (M)	F (M)	F (M)	F (M)	F (M)	F (M)	F (M)	F (M)	F (M)	F (M)
LSBU	656 (582.3)	341 (315)	292.8 (289.5)	104 (49)	54.9 (25.2)	17 (23)	14.3 (22.5)	59 (83)	53.4 (77.5)	30 (22)	72 (51)	148 (109)	92 (132)
% All LSBU				23.3%	13.7%	6.1%	6.3%	21.6%	22.5%	7.9%	18.8%	39.2%	34.1%
% Female: (Male) All		52.0% (48%)	50.3% (49.7%)	15.8% (7.5%)	9.4% (4.3%)	2.6% (3.5%)	2.5% (3.9%)	9.0% (12.7%)	9.2% (13.3%)	4.6% (3.3%)	11.0% (7.8%)	22.5% (16.6%)	14.0% (20.1%)
UoA3	17 (14.6)	16 (1)	13.6 (1.0)	4 (0)	1.6 (0)	0 (0)	0 (0)	0 (0)	0 (0)	3 (0)	5 (1)	5 (0)	3 (0)
UoA4	11 (9.8)	6 (5)	4.8 (5.0)	2 (0)	0.8 (0)	0 (0)	0 (0)	0 (0)	0 (0)	1 (2)	2 (2)	3 (1)	0 (0)
UoA15	35 (33.5)	9 (26)	8.5 (25.0)	1 (2)	0.5 (1.0)	0 (1)	0 (1.0)	3 (15)	3.0 (15.0)	0 (2)	2 (5)	6 (11)	2 (7)
UoA19	10 (9.25)	2 (8)	2.0 (7.25)	0 (1)	0 (0.25)	0 (0)	0 (0)	2 (2)	2.0 (2.0)	0 (0)	1 (1)	1 (2)	0 (5)
UoA22	18 (14.9)	12 (6)	9.7 (5.2)	5 (1)	2.7 (0.2)	0 (1)	0 (0.2)	4 (2)	3.4 (2.0)	1 (0)	4 (2)	5 (1)	2 (3)
UoA26	11 (9.4)	3 (8)	3.0 (6.4)	0 (2)	0 (0.4)	0 (0)	0 (0)	0 (0)	0 (0)	1 (1)	1 (3)	1 (4)	0 (0)
UoA36	14 (10.2)	6 (8)	4.0 (6.2)	4 (2)	2.0 (1.0)	0 (1)	0 (1)	2 (1)	2.0 (0.5)	0 (1)	3 (1)	2 (5)	1 (1)
REF Submissions													
REF Staff	116 (101.65)	54 (62)	45.6 (56.05)	16 (8)	7.6 (2.85)	0 (3)	0 (2.2)	11 (20)	10.4 (19.5)	6 (6)	18 (15)	23 (24)	8 (16)
% REF vs All				20.7%	10.3%	2.6%	2.2%	26.7%	29.4%	10.3%	28.4%	40.5%	20.8%
% Female: (Male) in REF		46.6% (53.4%)	44.8% (55.1)	67% (33%)	72.7% (27.3%)	0% (100.0%)	0% (100%)	35.5% (64.5%)	34.8% (65.2%)	50.0% (50.0%)	54.5% (45.5%)	48.9% (51.1%)	33.3% (66.7%)
% REF vs All		17.7%	17.4%	15.6%	13.0%	7.5%	6.0%	21.8%	22.8%	23.1%	26.8%	18.3%	10.7%
% REF vs All (F/M)		15.8% (19.7%)	15.5% (19.4%)	15.3% (16.3%)	13.8% (11.3%)	0% (13.0%)	0% (9.8%)	18.6% (24.1%)	19.5% (25.1%)	20% (27.3%)	25.0% (29.4%)	15.5% (22.0%)	8.7% (12.1%)

London South Bank University

Equality Impact Assessment Document:

Code of Practice on Selection of Staff for Inclusion in REF2014

Section:	
1.1	**Assessors** Ms Satwant Kaur - Senior OD & EDI Manager (Interim) Dr Ed Tinley - Head of Central Research Support
1.2	**Purpose of Policy** Selection of LSBU Staff for Inclusion in REF2014
1.3	**Related LSBU corporate policies:-** Recruitment and Selection Policy Equality Diversity and Inclusion Grievance Procedure Appeals Procedure
1.4 - 1.5	**The main aim of the policy, service, function or project being analysed** • The aim of the REF Selection Policy is to provide a framework against which those staff eligible for inclusion in the REF2014 can be identified and selected. • The Policy describes the University's REF Management and Selection criteria/framework, REF Communication strategy; REF Selection processes; Staff Circumstances process and Appeals procedures.

1.6	**Who does the policy affect?** Those LSBU staff satisfying the REF eligibility criteria.
1.7	**Key performance indicators of this policy**. Overall numbers and proportions of staff eligible and included in LSBU REF2014 submission relative to the wider University staff profile Numbers and proportion of REF-eligible staff with protected characteristics involved in the REF2014 process/submission measured against the wider University profile for individual characteristics.
1.8	**Equalities Research Data utilised.** Demographic profile of REF- eligible staff across protected characteristics included/not included in LSBU's REF2014 submission in key research areas, including - Gender, Employment Status, Race; Age and Disability.
1.9	**Recorded consultation that has taken place with any of the people who may be affected/impacted by the activity** No consultation with staff involved in or affected by the Policy has, as yet, been carried out.
2.0 – 2.1	**Demographic Profile Data** Although robust staff data has been collected post-REF2014, this information does not reflect all of the diversity strands as defined in the REF Guidance on Submissions and the Equality Act 2010. The main EDI categories of Age, Disability, Race, Maternity, Paternity and Adoption, Part time employment and ECR were captured but other protected characteristics such as religion and belief, and sexual orientation were not available for analysis.
2.2	Capture and analyse data that will allow the University to establish anomalies and trends in terms of EDI, however coincidental or unintentional. Assess and record details of any positive impact or effect the activity might have on Equalities Groups.

Assessing Positive Impact

	Yes	No
Could this policy, service, project or function have a major impact (positive or negative) on LSBU staff.	✓	
Could this policy, service, project or function impact positively	✓	

on different groups ?	
	Yes **No**

Analysing Positive Impact:	
Analysing how the Policy or function impacts positively on the following groups:	

Group:	Evidence:
Race (All Racial Groups)	Staff from all equality groups benefit from the existence and implementation of this policy as it aims to ensure that the REF2014 process is clear, transparent, equitable and inclusive and that staff who can evidence a reduction in research outputs as a result of mitigating circumstances can apply to do so without being unduly penalised.
Gender (Including Gender Reassignment, Maternity and Marital Status)	**As above.**
Disability (Physical and Mental Impairments**)**	**As above.**
Age	**As above.**
Sexual Orientation	**As above.**
Religion & Belief	**As above.**
Part-time and fixed-term employment status	**As above.**

	Yes	**No**
Could this policy, or function impact adversely on different equality groups?	✓	
Do people from different equalities groups have different expectations and needs of or from this policy, project service or function ?	✓ (Yes)	(No)
Is there evidence that any part of the policy, project, service or function could discriminate unlawfully either directly or indirectly against any equality groups ?		✓

Adverse impact is where the affect or impact of the policy, service, project or function results in less favourable treatment, discrimination or disadvantage which may be direct, indirect or not immediately obvious and is not capable of being justified.

2.5 **How does the policy, service, project or function adversely impact on the following groups:**

Group:	Evidence:
Gender (Including Gender Reassignment, Maternity and Marital Status)	The Code of Practice applies equally to all academic staff with Teaching and Research, or Research Only, contracts irrespective of their equality group or protected characteristics.
Race **(All Racial Groups)**	Following an earlier EIA of the University's 2008RAE Code of Practice, a number issues were identified that could lead to discrimination against ethnic minority and or staff across protected characteristic groups.
Disability	Amendment has been made to the REF 2014 Code to reduce the risk of differential impact that may adversely affect the inclusion of staff drawn from different equality groups and/or across protected characteristics. Specifically, the Code: (i) is directly accessible by all staff, including staff temporarily absent from the University; (ii) contains a clear Communications plan giving details of the REF process; (iii) sets out appeals procedures, (iv) sets out EDI training requirements for those staff involved in the REF selection process.
Sexual Orientation	Where appropriate workshops with groups of staff in ethnic minority/protected characteristic groups will be organised to encourage broader participation from staff in such groups. The Code explains Defined and Complex Circumstances and stresses the *'without penalty'* clause for reducing the number of submitted outputs in accordance with REF 2014: Assessment Framework and Guidance on Submissions. To address sensitivity issues the Code stresses that all such data will be treated as confidential and will be seen only by the Staff Circumstances group, independent from those making decision on selection.
Religion / Belief	**Equality, Diversity & Inclusion:**
Age	LSBU has a clearly stated commitment to equality, diversity and inclusion (EDI) both as an employer and as an educational institution. EDI is defined as working to ensure that diversity is valued, everyone is completely accepted and integrated regardless of diversity background and that no student or member of staff receives less favourable treatment on the grounds of any of the protected characteristics.

UPDATED EIA ACTION PLAN: Post-REF2014

(Subject to the approval of LSBU University Research Committee)

	Proposed Action	Timescale:	Lead:	Measure/Outcomes	Status
1.	Ensure better capture, analysis and reporting of data relating to equality groups identified in the REF Guidance on Submissions and the Equality Act 2010, including, the protected characteristics group.	July 2012 (Revised timescale July 2015)	HR Director	Issue annual report/analysis by LSBU Department and Faculty on the LSBU staff complement make-up; to include data on the nine protected characteristics.	Ongoing
2.	Ensure effective consultation to garner and record the views and opinions of those groups of staff likely to be most affected by the staff selection policy for the REF exercise.	October 2012 (Revised timescale October 2014)	Pro VC (Academic)	Circulation of the Code of Practice on the Selection of Staff for Inclusion in REF2014. Broader input and opinion on the merits of the current Code.	Ongoing
3.	Ensure REF Staff Selection Policy is reviewed, updated and aligned with LSBU EDI policy as well as with HEFCE REF2014 Guidance on Submissions.	July 2012	E&D Manager & Head Research Support	Greater coherence around LSBU EDI policy	Completed
4.	Ensure effective Communications strategy in place to encourage participation from all groups of staff, particularly women, BAME, disabled and ECR staff.	September 2012	REF Working Group & Head Research Support	Readily available information for all staff, including those absent from LSBU on REF2014 and its process. Greater clarity on LSBU REF objectives and criteria.	Completed

5.	Complete 1st and 2nd Round Mock Audits and undertake analysis of staff submission data, specifically for those with protected characteristics.	Spring 2013	Directors of Research	Indication of likely REF UoAs and make up, including protected characteristics.	Completed
6.	Ensure Selection policy is amended to articulate how those with Clearly Defined and Complex Circumstances will be assessed and how eligibility for reduced outputs will be determined in accord with the REF2014 Guidance on Submissions: Ensure the "without penalty" clause is emphasised.	July 2012	Head Research Support	Greater clarity in Code of Practice for those who believe their research outputs might have been affected by Defined and /or Complex Circumstances.	Completed
				Letter to all academic staff from VC stressing importance of Staff Circumstances criteria and urging response if believe affected.	Completed
7.	Establish a Staff Circumstances Group to ensure a transparent, equitable and objective assessment of personal circumstances. Develop a Staff Circumstances Disclosure Form and issue with Guidance Notes.	End September 2012	Director of HR & Head of Research Support	Independent panel that is not involved in REF Staff Selection process, to consider eligibility for reduced outputs based upon Staff Circumstances.	Completed
8.	Establish a REF-specific Appeals protocol for staff dissatisfied with their proposed omission (or inclusion) from LSBU's REF submission in order to ensure a fair and timely appeals process.	End December 2012	Pro VC (Academic) & Head Research Support	Clear independent appeals procedure for staff. Timely process for considering appeals with respect to REF submission date.	Completed

9.	Undertake an assessment looking into the reasons for the under representation of disabled staff in LSBU's REF submission.	End July 2014	Director of HR and Head Research Support.	Clarification of reasons why fewer disabled staff than in University population as whole returned to REF.	
10.	Ensure dedicated and up to date web site for REF2014 remains live on University web pages, to include updated Code of Practice and latest EIA.	End March 2014	Head Research Support	Maintain staff awareness of REF matters and importance of EDI to University and future REF exercises.	