

**Equality Impact Assessment (EIA) Recording Form**

Please refer to the notes and examples in the EIA Guidelines to help complete this record

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| Title of Activity/Proposal/Policy/Practice | To review proposed changes to the Tuition Fee Policy for 2016-17 and the proposed fee increases. | | EIA Team and Lead Member of Staff | Lead: Finance Manager  Team:  Student Association  Student Support  Equalities | Date  16/12/2015 |  |
| Type of Policy/Practice/ (tick box) | New |  |
| Existing | ✓ |
| Revised |  |

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| **Step 1 – Considering the aims of the policy/proposal and evidence of how it affects different groups** | |
| What are the aims and purposes of the activity/ decision/ new or revised policy or procedure?  See Note 1 | The Tuition Fee Policy links to the college’s strategy and the Finance operational plan and is updated annually.  The College must ensure that the policy for tuition fees including refunds, deposits and withdrawals represents fair and reasonable consideration towards students and simultaneously protects the College from financial loss.  The main updates includes policy changes advised by the SFC, but the college has discretion to set non-standard fees and set policy for other issues e.g. instalment and payment plans, refunds, deposits and withdrawals  Staff must adhere to the policy, advising students and students must have access to it and the student guidance that flows from it i.e. guidance for Students Funding, Fee Waiver exemption, How to pay Tuition Fees and Terms and Conditions for the payment of Tuition Fees. This guidance is on the intranet and also sent to students when they apply to the college.  The aims are:   1. To update the College’s approach to Tuition fees ensuring they are fair, equitable and clear including:  * Tuition fee increases; * the fee status and determination of students; * concessionary fees and fee waivers; * instalment or payment plans; * refunds, deposits and withdrawals; * international fee charging and collection |
| Who will be affected?  See Note 2 | Students and staff |
| Who will be consulted?  See Note 3 | | The Student President and Edinburgh College Students Association (obo students representing different equality groups), the Student Support, Equalities, Student Records and Finance teams. |
| What evidence is available of how the policy/decision, etc. affects, or may affect, protected groups?  Evidence could be quantitative, qualitative or anecdotal.  Do we have enough evidence to judge what the impact may be?  See note 4 | | SFC Policy, historic equality and tuition fee profiling reports across the college and comparable prices/increases for other colleges/universities in Scotland.  Following a review of fees for 2016-17 SAAS confirmed there will not be increases to full-time Advanced course fees, and the SFC confirmed there will be no increases for Non-Advanced course fees.  For part-time courses, there is a proposal to apply a 4% increase to course fees based on a market review compared to other colleges, and local Universities (with the exception of commercial, international, community based ESOL, and other market sensitive course fees).  The policy guidance from SFC, incorporated into the college’s tuition fee policy annually had minor changes from 15-16 to 16-17.  The EIA has therefore been completed for the minor changes to the policy and the proposed 4% increase to part-time tuition fees, with the exception of commercial, international, community based ESOL, and other market sensitive course fees e.g. there is evidence for some increasing commercial and international fees by more than 4%, but to not increase community based ESOL fees.  The Equality impact assessment for the proposed increase to part-time tuition fees did not identify any significant adverse impact on any of the protected characteristic groups.  Equality profiling across the college indicated that certain protected characteristic groups were more likely to study part-time (i.e. women, students with disabilities, Home students from Black or ethnic minority groups (BME) or students from socially and economically disadvantaged areas). Therefore it was particularly important to consider the likely impact of a 4% increase upon these groups.  However, the group did identify the need for future additional information, to ensure that all opportunities to ensure equality have been undertaken. This will include a follow-up questionnaire to students not applying for a course following enquiry. The group also agreed that an action plan should be implemented to ensure that more information is available for the 2017/18 EIA.  The majority of the protected characteristic groups are predominately funded by the SFC part-time fee waiver grant. This grant is available for students in certain circumstances (such as students in receipt of certain benefits or on grounds of low income), and are therefore not affected by an increase in fees.  In conclusion, the group did not identify any significant impact on any of the protected characteristic groups of students. |

**Step 2 – Assessing the impact**

This involves:

* Considering relevant evidence relating to people who share a protected characteristic
* Assessing the impact of applying a decision of a new or revised policy or practice against the needs of the Public Sector Equality Duty (PSED) and each protected characteristic.

The Public Sector Equality Duty:

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| **Eliminating discrimination, harassment and victimisation** | **Advancing equality-**   * **Removing disadvantage** * **Meeting different needs** * **Encouraging participation** | **Fostering good relations**   * **Tackling prejudice** * **Promoting understanding** |

See Note 5

Key Questions to ask:

1. What potential positive/neutral/negative impacts can be identified?
2. What does evidence demonstrate about positive/neutral/negative impacts for different protected characteristic groups? E.g. statistics on participation, progression or outcomes, feedback or complaints
3. Does the policy/procedure/practice/decision take account of the needs of people with different protected characteristics? How is this demonstrated?
4. Does it affect some groups differently? Is this proportionate?

See Note 6

| Protected characteristic | Potential  Positive Impact Y/N | Details of Expected Positive Impact | Potential Negative Impact Y/N | Details of Expected Negative Impact |
| --- | --- | --- | --- | --- |
| Age | N |  | N |  |
| Disability | N | The analysis did not provide conclusive evidence of a positive impact as the group are generally less likely to be self-financing and would be unaffected by the increase. There is evidence that they are more likely to be eligible for fee waiver and so funded by the SFC. | Y | People with disabilities (e.g. visual impairment, learning difficulties and Deaf BSL users for whom English is not their first language) and other students with English as an additional language in particular may find the Tuition fee policy difficult to read and may not understand whether or not the changes to the tuition fees will affect them. |
| Gender reassignment | N |  | N |  |
| Marriage/civil partnership (relevant in employment law) | N |  | N |  |
| Pregnancy and Maternity | N |  | N |  |
| Race | Y | The analysis indicated that BME home Part-time students were more likely to be self-financing. Further investigation was carried out on this group of students.  Some Community based ESOL courses fees have not been increased. This supports the college’s work on promoting equality of opportunity, especially with respect to people (including women) of ethnic minority backgrounds and those from socially and economically disadvantaged areas. It also promotes good community relations.  The fee waiver scheme also supports access for the above protected groups, helping those on low incomes (including single parents and those with disabilities). Other practices, such as offering discretionary instalments plans, help to ensure access to education. | Y | People with disabilities (e.g. visual impairment, learning difficulties and Deaf BSL users for whom English is not their first language) and other students with English as an additional language in particular may find the Tuition fee policy difficult to read and may not understand whether or not the changes to the tuition fees will affect them. |
| Religion or belief | N |  | N |  |
| Sex | N | Although women are more likely to study part-time, the analysis did not provide conclusive evidence of a positive impact as the group are generally less likely to be fully self-financing and would be unaffected by a small increase e.g. fees can be partly funded by ILA/SAAS/employers or often by fee waiver. | N | The analysis did not provide conclusive evidence of a negative impact |
| Sexual orientation | N |  | N |  |
| Social deprivation\*  See Note 7 | Y | The group are generally less likely to be self-financing and would be unaffected by the increase to tuition fees.  However, some Community based ESOL courses fees have not been increased. This supports the college’s work on promoting equality of opportunity, especially with respect to people (including women) of ethnic minority backgrounds and those from socially and economically disadvantaged areas. It also promotes good community relations.  The fee waiver scheme also supports access for the above protected groups, helping those on low incomes (including single parents and those with disabilities). Other practices, such as offering discretionary instalments plans, help to ensure access to education. | Y | People with disabilities (e.g. visual impairment, learning difficulties and Deaf BSL users for whom English is not their first language) and other students with English as an additional language in particular may find the policy difficult to read and may not understand whether or not the changes to the tuition fees will affect them. |
| Care leavers/looked after young people\* |  |  |  |  |
| People with caring responsibilities\* |  |  |  |  |

**Step 3 – Acting on the results of the assessment.**

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| What actions can be taken or amendments made to policy to reduce the negative impact?  See note 8 | Ensure students get support and advice regarding applying for Fee Waiver or tuition fee payment plans.  People with disabilities (e.g. visual impairment, learning difficulties and Deaf BSL users for whom English is not their first language) and other students with English as an additional language in particular may find the policy difficult to read and may not understand whether or not the changes to the tuition fees will affect them.  This impact could be reduced by good signposting to other information about funding, to student services for advice and support. Liaising with student services, so that staff are aware of changes. Changes to the policy to make it more inclusive and accessible |
| Is there a need to address any gaps in evidence? | Yes, the group did identify the need for future additional information, to ensure that all opportunities to ensure equality have been undertaken. This will include a follow-up questionnaire to students not applying for a course following enquiry.  The Interim Associate Principal is managing the 16-17 recruitment campaign, including gathering information about students who enquire about a place on a course but do not apply. The Finance Manager has asked if information can be gathered for the 16-17 applicants regarding the reason they do not proceed with an application to identify if it is to do with increases in tuition fees. The information will be used for the EIA for the policy updates for 2017-18. |
| How will equality be advanced/ good relations be fostered? | Close working relationships with the ECSA and financing liaising with the Student Services and Student Records team.  Finance also work closely with the college’s complaints handling co-ordinator to identify any issues that have come up as a result of changes to the Tuition Fee Policy. |
| Who has been involved in carrying out this assessment? | The EIA group consisted of:   * Finance Manager * Student President * Head of Support for Learning * Student Funding Manager * Equalities, Policies and Research Manager * Equalities Officer |
| If you cannot fully review the impact now, what else must be done, by/with whom and why? | The group did identify the need for future additional information, to ensure that all opportunities to ensure equality have been undertaken. This will include a follow-up questionnaire to students not applying for a course following enquiry. The group has asked for 16-17 enrolment enquiry information. |

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| **Recommended decision:** (place an x against relevant outcome)  See note 9 | Outcome 1 - Proceed – no potential identified for discrimination or adverse impact, and all opportunities to promote equality have been taken | **X** |
| Outcome 2 – Proceed with adjustments to remove barriers identified or to better promote equality |  |
| Outcome 3 – Continue despite having identified some potential for adverse impact or missed opportunity to promote equality |  |
| Outcome 4 – Stop and rethink as actual or potential unlawful discrimination has been identified |  |
| Any other recommendations? | | |
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**Step 4: The monitoring and review stage**

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| **Plan actions to reduce negative impact, advance equality and monitor the impact of the policy, proposal or decision**   * Please indicate if there is any data which needs to be collected as part of action to be taken and how often it will be analysed. * Indicate how the person responsible will continue to involve relevant groups and communities in the implementation and monitoring of the policy, etc. * How will the impact of the policy/procedure/decision be monitored?   See Note 10 | | |
| **Action to be Taken:** | **Person Responsible:** | **Completion/Review Date:** |
| A follow-up questionnaire to students not applying for a course following enquiry. The group has asked for 16-17 enrolment enquiry information. | Finance Manager/Interim Associate Principal | tbc |
| Monitoring of any student complaints | Finance Manager | Collected throughout the year. |
| Additional data criteria built into the student records database – Unite, to support evidence.  There is currently no budget to support this work, but the EIA group that will work on the updates to the 2017-18 policy will investigate additional data required and submit a proposal for changes to SMT. The EIA would benefit from the expertise of a member of the systems team to support the EIA work. | Finance Manager | tbc |
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| **Signature of Lead:**  **Date: 20/01/2016** | | |
| **Step 5 – Review and Publication**  See Note 11  Please send the completed EIA record to Head of Quality and Equalities, for   * review by Equalities team * publication in whole or in part on the College website. | | |