



### **Equality Impact Assessment (EIA).**

As part of the University's commitments in relation to the Equality Act 2010, we are legally bound to show "due regard" to the aims of the Public Sector Equality Duty (PSED) when making decisions and setting policies. This duty focuses on the need to pay due regard to:

- Eliminate discrimination, harassment and victimization
- Advance equality of opportunity between different groups, and
- Foster good relations between different groups.

It is therefore essential that consideration is given to the 9 protected characteristics identified in the Equality Act 2010 in regards to any change, with positive and negative impact identified. Change in this context refers to, but is not limited to the following: strategy development; projects and plans; initiatives, policy and procedure creation or amendment; restructure. Evidence of consideration should be logged accordingly, to be referred to in response to any potential legal challenge, whereby the university would be expected to justify their actions and decisions.

An Equality Impact Assessment (EIA) is a process designed to ensure that policies, practices and initiatives are fair, meet the needs of our staff and students and that they do not unlawfully discriminate against any protected characteristic.

An EIA should form part of any decision-making process and not be seen as an add-on at the final stage. Assessing impact early avoids wasted time and resource, as changes and mitigations can be applied at the outset of the journey, using reliable data and/or engagement with key groups to inform and guide the change. The Equality and Human Rights Commission (EHRC) are clear that engagement should be proportionate and relevant to the size of the organisation and the significance of decision.

It is imperative that the EIA is completed by the lead colleague responsible for the change in the university, to draw on their specialist knowledge and take ownership from the moment of conception, to the final decision and in regards to future monitoring. Further development will be required to record and measure original expectation, alongside possible further equality action.

The form on page 2 will enable you to reflect on the proposed change and assess the potential positive and negative impact from an equalities perspective on our university community.

<b>Title of EIA:</b>	EDI Policy Review
<b>Lead colleague and contact details:</b>	Lee McDermott <a href="mailto:lee.mcdermott@cumbria.ac.uk">lee.mcdermott@cumbria.ac.uk</a>

<b>Step 1: Identify the proposed change e.g. strategy development; projects and plans; initiatives, policy and procedure creation or amendment; restructure</b>
<p>The EDI Policy was due for review after the initial April 2022 implementation.</p> <p>Our EDI Policy explicitly cites all 9 protected characteristics affording and reinforcing protection from bullying, discrimination, harassment and victimisation, including from an intersectional perspective and is in-keeping with our University Inclusivity Statement hosted at <a href="#">Equality, Diversity &amp; Inclusion - University of Cumbria</a>. This gives those reporting negative instances linked to this policy and the university, a strengthened position to hold those who breach the policy accountable, including where informal resolution is not successful.</p> <p>The policy has received minor updates as part of consultation, including transitioning to a new policy template. Updates include:</p> <ul style="list-style-type: none"> <li>- Emphasizing in the scope that the policy is applicable at all stages of student and staff lifecycle including social media activity</li> <li>- Noting in the scope that external associated persons would be expected to reciprocate the policy principles in dealings with our university community</li> <li>- Policy section has updated the wording and to the first bullet point and integrated a later bullet point which was essentially a duplication</li> <li>- Section 7 Internal Monitoring has been added and updated to the Roles and Responsibilities section in line with the new template and providing greater emphasis on the activity of EDIW Committee and EDIW Monitoring Group</li> <li>- Updated final bullet point in the Roles and Responsibilities section to include “visitors” so this aligns with the Scope and also removed language of “on the premises” so the policy now extends to cover any online activity or off-campus activity</li> <li>- Sanctions and Commitments section has merged Section 6 and 8 from the original policy on the old template and You Report, We Support has been added</li> <li>- Appendix A now provides a link to ACAS for people to access definitions of discrimination and for examples of this in relation to protected characteristics. This section also places Hate Crime directly after Discrimination as these were noted as overarching within consultation and the following definitions have been alphabetized, with UCSU exploring an updated Homophobia definition to go beyond just LGB. Stonewall provided context to the EDI Officer, which has been included to accompany the existing definition to be more inclusive.</li> </ul>

<b>Step 2: Please reference sources of data/information, consultation, or individuals/groups you have identified to explore equalities impact</b>
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Sector review including existing policy from Northumbria University, Uni of Manchester and utilising North West Equal Opportunities Network, Cathedrals Group and EDI Data Analyst Network for insight.

ACAS guidance [Equality, diversity and inclusion policy template | Acas](#)

Business Disability Forum – Legal Ease Webinar accessed 8<sup>th</sup> November 2023.

D&I Leaders - Taking a deep dive into the UK Equality Act: Myths and Facts webinar accessed 24<sup>th</sup> November 2023.

AMOSSHE Harassment in HE: prevention and response – attended 1<sup>st</sup> December conference. Key takeaways for policy development noted as; use plain English, avoid referencing criminal law in a civil policy and use neutral language in policy.

[Equality, Diversity and Inclusion Data & Reports - University of Cumbria](#)

HR Business Partners.

Staff Consultation sessions hosted on 30<sup>th</sup> November 12-1pm and Tuesday 5<sup>th</sup> December 1-2pm. Details were promoted in the staff global, blackboard and there were targeted comms to: Staff LGBTQ+ Network, DANN, Uni of Sanctuary Steering Group, Parents and Carer's Network, Health and Wellbeing Champions, Athena Swan SAT, White Ribbon Steering Group, UCSU, EDIW Monitoring Group and Staff Menopause Group.

30/11/23 Consultation Session

Lecturer in Social Work

Specialist Learning Advisor / UCU Equalities Rep

Lecturer in Investigative Practice

SL in Leadership and Sustainability

UCSU

UCSU

05/12/23 Consultation Session

Strategic Lead, Access and Participation

Placement Officer

UCSU FHS Campus Rep

Student Consultation sessions hosted on 7<sup>th</sup> December 12-1pm and 19<sup>th</sup> December 1-2pm. Details promoted in the student global, blackboard and requested UCSU promote to student networks. 3 attendees in 19<sup>th</sup> December session.

Stonewall.

<b>Step 3: Assessing the change in relation to potential impact on the universities diverse community</b>					
	<b>Acknowledge Potential Positive, Negative or Neutral Impact on Groups (please include relevant data if possible)</b>	<b>Action Plan: how will you mitigate or remove the potential negative impact and maximize the potential positive impact?</b>			
		<b>Action required</b>	<b>Person responsible</b>	<b>Target date</b>	<b>Progress to date</b>
<b>Age</b> (consider older people, younger people, early-career researchers etc.)	Positive	New version of EDI Policy will be communicated to raise awareness	EDI Officer	May 2024	EDI Policy in place since April 2022.
<b>Disability</b> (including mental health and non-visible disability)	Positive  Whilst above the sector in terms of those identifying as having a disability, numbers continue to rise and not all members of our community disclose, this	New version of EDI Policy will be communicated to raise awareness	EDI Officer	May 2024	EDI Policy in place since April 2022.  This policy review supports the development of <a href="#">Disability &amp; Neurodivergent Network (DANN) - University of Cumbria</a> , Disability Confident Leader Level accreditation, Hidden Disabilities Sunflower scheme membership and changes to our estate.

	policy ensures they will be supported and any negative circumstances addressed accordingly				
<b>Gender reassignment</b> (including Trans and non-binary people, gender identity and gender expression)	Positive	New version of EDI Policy will be communicated to raise awareness	EDI Officer	May 2024	EDI Policy in place since April 2022. This policy supports the Staff Trans Record Policy, Student Trans Record Policy and changes to our estate.  Development of <a href="#">LGBTQ+ Staff Network at the University of Cumbria</a> and related training/action.
<b>Marriage and civil partnership</b>	Positive	New version of EDI Policy will be communicated to raise awareness	EDI Officer	May 2024	EDI Policy in place since April 2022.
<b>Pregnancy and maternity</b> (including adoption)	Positive	New version of EDI Policy will be communicated to raise awareness	EDI Officer	May 2024	EDI Policy in place since April 2022. This policy supports Student Pregnancy and Family Leave Policy, Family Friendly Policy developments and changes to our estate.
<b>Race</b>	Positive  We are a predominantly white organisation (approx. 90% when combining	New version of EDI Policy will be communicated to raise awareness	EDI Officer	May 2024	EDI Policy in place since April 2022. Reinforces action linked to the promotion of Union Black, race-related and anti-racism activity as part of our REC developments and EDIW Schedule of Events

	staff/students). This policy is in place to emphasize that discrimination linked to race and ethnicity will not be tolerated.				
<b>Religion and belief</b> (including those without religion or belief)	Positive	New version of EDI Policy will be communicated to raise awareness  EDIW Committee to be presented with an alternate definition for Islamophobia to consider as highlighted in consultation (both this and the existing MCB definition are fit for practice)	EDI Officer	May 2024	EDI Policy in place since April 2022. Supports chaplaincy activity, our Cathedral Group association and wider religion and belief activity such as comms, our (multi) faith spaces and values and changes to our estate.
<b>Sex</b>	Positive	New version of EDI Policy will be communicated to raise awareness	EDI Officer	May 2024	EDI Policy in place since April 2022. Supports gender equality developments such as Athena Swan and changes made to data reporting that link to sex and gender
<b>Sexual orientation</b>	Positive	New version of EDI Policy will be communicated to raise awareness  A new definition of homophobia was explored as part of consultation and developments and the Stonewall definition of Bi has	EDI Officer	May 2024	EDI Policy in place since April 2022. Supports development of LGBTQ+ Staff Network and related training/action, such as that in our EDIW Schedule of Events.  Explored Homophobia definition and left as on the original version based on

		been included alongside the existing Homophobia definition.			<p>Stonewall account manager advice. Their definition of bi is:          “We see bi as an umbrella term to describe a romantic and/or sexual orientation to more than one gender which would encompass pan and other identities.</p> <p>This is our definition of bi on the website:  <i>Bi is an umbrella term used to describe a romantic and/or sexual orientation towards more than one gender. Bi people may describe themselves using one or more of a wide variety of terms, including, but not limited to, bisexual, pan, queer, and some other non-monosexual and non-monoromantic identities.”</i></p>
<b>Other International</b>	Positive	New version of EDI Policy will be communicated to raise awareness	EDI Officer	May 2024	EDI Policy in place since April 2022

**Step 4:** Next steps. Please consider:

- Is further monitoring/engagement required?
- How will you measure mitigation in regards to potential negative impact?
- How will you measure maximizing potential positive impact?
- When will you review this EIA?

Annual EDI Report includes diversity reporting. Wider EDI activity and workstreams will continue to maximise impact and create positive change, monitored by steering groups and onward reporting to EDIW Monitoring Group and EDIW Committee (which includes representatives from UCSU, UCU, Unison and staff networks).

Continued promotion of the EDI policy and University Inclusivity Statement where appropriate and relevant.  
 This policy can be cited/referenced in EIAs and other policy development where appropriate.  
 Student Services and HR monitor reports of any grievances linked to discrimination, bullying and harassment. Exit interviews have an EDI focus to capture relevant staff feedback.  
 There will be monitoring/measuring via staff surveys and maintaining and building on external charter mark achievements such as Stonewall Silver Award, Disability Confident Leader and Athena Swan Bronze Award.  
 EIA will next be reviewed in 3 years' time when the policy is next due for review.

<b>Step 5:</b> Final review. Please confirm the lead colleague has reviewed this EIA and is satisfied it can be considered for final consultation/sign-off.			
Name:	Lee McDermott	Date:	3/01/24

<b>Step 6:</b> Institutional approval confirming that this EIA is satisfactory in terms of analysis, consultation and mitigation, acknowledging that future monitoring and review will be undertaken to assess actual impact.	
Chair of Committee/Director of Institute/Head of Service:	EDIW Monitoring Group
Date:	4/1/24