



### **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>	People and Culture Strategy
<b>Lead colleague and contact details:</b>	Paul Boustead, HR Consultant & Zoe Pluckrose-Norman, People & Culture Director

<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 strategy is being developed to support the implementation of the people and culture-related activities within the Towards 2030 overarching strategy. <a href="https://www.cumbria.ac.uk/media/towards-2030.pdf">https://www.cumbria.ac.uk/media/towards-2030.pdf</a>.</p> <p>The strategy describes the initial next steps (2024-2026) in working towards the Towards 2030 strategy ( link above). The original People &amp; Culture strategy covered a period until 2030, however, this has been reduced to support the University to make realistic commitments. The strategy will be further developed to cover the lifespan of the 2030 document ( with further VCD/PPCC approval and EIA for further strategy developments)</p> <p>The strategy is underpinned by the University Inclusivity statement <a href="https://www.cumbria.ac.uk/media/towards-2030.pdf">https://www.cumbria.ac.uk/media/towards-2030.pdf</a> , and is supplemented by our existing policies and procedures most noticeably the Universities Equality &amp; Diversity Policy.</p> <p>Individual projects/workstreams will require individual EIA -, ie new ways of working, reward and recognition initiatives. The strategy does not set out details of the projects – ie how we will increase accountability and autonomy – but sets out that we need to invest time and energy to ensure our colleagues have the autonomy they need to do their jobs as effectively as possible, and we have the right level of accountability. Some EIA may be completed in conjunction with EIA completed for other projects/initiatives, ie Proactive Communication &amp; engagement - links to Employee Communications Plan ( which has its own EIA). The EIA for change programmes/initiatives will highlight areas to further promote equality.</p> <p>The People and Culture Strategy, as a key enabling strategy, will be monitored bi-annually by VCD, JNCC and PPCC. The success of the strategy will be measured using a number of key business measures which are the Universities EDI metrics <a href="#">Equality, Diversity and Inclusion Data &amp; Reports - University of Cumbria</a> and gender pay policy.</p>

<b>Step 2: Please reference sources of data/information, consultation, or individuals/groups you have identified to explore equalities impact</b>
Sector review including People & Culture strategies from Strathclyde, Edinburgh, Edgehill & University of Sussex.

There has been an extensive consultation process, which has included hosting several staff engagement/ world café events, engagement with colleague networks, and an online consultation process. Face-to-face and online sessions were promoted via sharepoint throughout the consultation process.

Details of the sessions are included on the following link:

<https://unicumbriaac.sharepoint.com/sites/HR/SitePages/People-and-Culture-Strategy.aspx?ga=1>

- 9<sup>th</sup> May online
- 19<sup>th</sup> May FHS
- 23<sup>rd</sup> May FHS & PM session online
- 24<sup>th</sup> May Lancaster
- 26<sup>th</sup> May online
- 31<sup>st</sup> May online
- 1<sup>st</sup> June online
- 14<sup>th</sup> June London

A number of face-to-face sessions were held. 204 colleagues were directly involved in providing feedback to the world café sessions.

For the online sessions padlet was used to obtain feedback.

Key positive themes drawn out from the online sessions:

- Colleagues support to each other, family feel within the university
- Flexibility - good annual leave provision, flexible working, hybrid working
- Welcoming culture, which is purposeful, innovative and collaborative
- Approachable leadership which is visible and open
- Enjoy watching students succeed “makes it all worthwhile”
- Feel valued
- Good pay, and great pay and great wellbeing support
- Great locations, with strong UoC history
- Strategy focused on regional development

Key constructive themes from the online sessions:

- Lack of autonomy in roles
- Below sector pay
- Limited feedback channels with available information hard to find
- Unrealistic/unclear role expectations
- Slow recruitment
- Outdated policies
- Lack of sustainability plans
- Unequal workload models
- Limited time for learning and development

NB – both positive and constructive feedback will be included in the internal launch of the policy.

Following the development of the original P&C strategy (author Paul Boustead), the P&C strategy was amended by the new People & Culture Director to include greater emphasis on colleague feedback (world café) and input from HR team in November 2023. Feedback from VC Q&A sessions (October/November 2024) was taken into consideration in the revised strategy. Q&A sessions were attended by a range of colleagues across the University, with a summary of themes discussed: <https://unicumbria.ac.uk/sites/StaffGlobalStories/SitePages/Staff-Q%26A-sessions.aspx>

Consultation has taken place with the following groups:

- HR Team
- UCU & Unison
- DANN & LGBTQ group
- VCD
- PPCC
- Other groups of less than 5 were consulted with ( and removed from this list)

Sources of data, which were reviewed to inform strategy:

- People Monitoring Reports
- Annual EDI report <https://www.cumbria.ac.uk/about/equality-diversity-and-inclusion/equality-data-and-reports/>
- Gender Pay gap data <https://www.cumbria.ac.uk/about/equality-diversity-and-inclusion/equality-data-and-reports/>

- Athena Swan charter mark and action plan
- EDI Policy

Hard data from these sources will be used in the development of implementation plans.

<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.)	21-30 = 94 (79.88fte) 31-40 = 191 (165fte) 41-50 = 295 (244.5fte) 51-60 = 347 (289fte) 61- 65 = 81 (61.76fte) >65 = 20 (11fte)  A positive, this strategy applies to all colleagues.  To note that change within the workplace can be difficult for any group. Where the change is required we will consult collectively to support with any change programme/initiative.	To develop an implementation plan, with EIA to review proposed action, assessing specific impacts of positive /negative impacts.  We need to understand how our culture and ways of working impacts on the age range of our working population. A deep dive into our culture will be contained within the Cultural roadmap workstream.	VCE/VCD/Line managers (for implementation)	February 2025	<ul style="list-style-type: none"> <li>• EDI Policy</li> <li>• Inclusivity Statement</li> </ul>

<p><b>Disability</b> (including mental health and non-visible disability)</p>	<p>Deaf or hearing difficulty = 8 (7fte)  Learning Difference = 29 (25.3fte)  Long term illness/health condition = 32 (26.6fte)  Mental Health condition = 20 (18.8fte)  No disability declared = 865 (710.83fte)  Other disability = 14 (11.6fte)  Physical difficulty = 8 (6fte)  Prefer not to say = 40 (33fte)</p> <p>A positive – strategy applies to all colleagues.</p> <p>To note that change within the workplace can be difficult for any group. Where change is required, we will consult collectively to support any change programme/initiative</p> <p>Ensuring fairness and compliance with the legislation of managers across the university – ie access to career development, understanding why colleagues would prefer not to declare a disability, negative feedback of process to review reasonable adjustments.</p>	<p>To develop an implementation plan, with EIA to review proposed action, assessing specific impacts of positive /negative impacts.</p> <p>We need to understand how our culture and ways of working impacts colleagues with disabilities range of our working population. A deep dive into our culture will be contained within the Cultural roadmap workstream.</p> <p>Consultation feedback included: Concern re online learning (doesn't allow sharing of good practice/generation of ideas, neurodiversity spaces,)</p>	<p>VCE/VCD/Line managers ( for implementation)</p>	<p>February 2025</p>	<ul style="list-style-type: none"> <li>• EDI Policy</li> <li>• Inclusivity Statement</li> <li>• Existing forums <a href="#">Disability &amp; Neurodivergent Network (DANN) - University of Cumbria</a>, and initiatives including Disability Confident Leader, Sunflower scheme</li> <li>• Reasonable adjustment action plan (in draft)</li> </ul>
<p><b>Gender reassignment</b> (including Trans</p>	<p>Gender ID matches assigned at birth  Prefer not to say = 22 (19.75fte)  Yes = 700 (577.86fte)</p>	<p>To develop an implementation plan, with EIA to review proposed action, assessing</p>	<p>VCE/VCD/Line managers ( for implementation)</p>	<p>February 2025</p>	<ul style="list-style-type: none"> <li>• EDI Policy</li> <li>• Inclusivity Statement</li> </ul>

<p>and non-binary people, gender identity and gender expression)</p>	<p>Blank = 303 (250.37fte)</p> <p>Positive – strategy is applicable to all colleagues. Existing forums include LGBTQ+ Staff Network at the University</p> <p>To note that change within the workplace can be difficult for any group. Where the change is required we will consult collectively to support any change programme.</p> <p>Ensuring fairness and compliance with the legislation of managers across the university – ie access to career development, ensuring gender reassignment is not a consideration.</p> <p>ensure documentation uses gender-neutral language throughout any documentation/comms plan. And any reference to potential family makeup is inclusive of an /all gender identities and sexual orientation</p>	<p>specific impacts of positive /negative impacts.</p>			<ul style="list-style-type: none"> <li>Existing forums <a href="#">LGBTQ+ Staff Network at the University of Cumbria</a> and initiatives include</li> </ul>
<p><b>Marriage and civil partnership</b></p>	<p>Co-habiting = 47 (40.6fte)          Divorced/civil partnership dissolved = 15 (10.6fte)          Married/civil partnership = 294 (240fte)          Prefer not to say = 10 (7.8fte)          Single = 194 (161.5fte)          Blanks = 463 (386fte)</p>	<p>To develop implementation plan, with EIA to review proposed action, assessing specific impacts of positive /negative impacts.</p>	<p>VCE/VCD/Line managers ( for implementation)</p>	<p>February 2025</p>	<ul style="list-style-type: none"> <li>EDI Policy</li> <li>Inclusivity Statement</li> </ul>

	<p>Positive – strategy is applicable to all colleagues</p> <p>To note that change within the workplace can be difficult for any group. Where change is required we will consult collectively to support with any change programme.</p> <p>Ensuring fairness and compliance with the legislation of managers across the university – ie access to career development, and ensuring colleagues marital status is not a consideration.</p>				
<b>Pregnancy and maternity</b> (including adoption)	<p>At 16 October 2023: Adoption Leave = 2 (1.8fte) Maternity Leave = 7 (6.6fte)</p> <p>Positive – strategy is applicable to all colleagues</p> <p>Ensuring fairness and compliance with the legislation of managers across the university – ie access to career development, ensuring pregnancy, maternity, adoption, paternity leave is not a consideration</p>	To develop implementation plan, with EIA to review proposed action, assessing specific impacts of positive /negative impacts.	VCE/VCD/Line managers ( for implementation)	February 2025	<ul style="list-style-type: none"> <li>• EDI Policy</li> <li>• Inclusivity Statement</li> </ul>
<b>Race</b>	<p>Positive</p> <p>Asian = 26 (22fte) Black = 17 (10.8fte) Mixed = 11 (9fte)</p>	To develop implementation plan, with EIA to review proposed action, assessing specific impacts of positive /negative impacts.	VCE/VCD/Line managers ( for implementation)	February 2025	<ul style="list-style-type: none"> <li>• EDI Policy</li> <li>• Inclusivity Statement</li> <li>• Imagery to be updated to</li> </ul>



	<p>Other = 1 (1fte)  Prefer not to say = 10 (15.8fte)  Unknown = 6 (5.6fte)  White = 949 (787.5fte)</p> <p>Positive – strategy is applicable to all colleagues</p> <p>The strategy encourages reflection on whether we are recruiting a diverse workforce, as we are 90% white as an institution. To dovetail with the EDI policy</p>	<p>The university needs to include more positive action activity in recruitment to support us have more diversity in this area specifically.</p> <p>Equality targets in relation to Race to be agreed upon (as set out in the T2030 strategy).</p> <p>Note - the University was unable to galvanize interest in a RACE equality colleague network. EDI officer confirmed will be an internal talk in Feb 24 to galvanize interest</p>			<p>reflect our diversity</p> <ul style="list-style-type: none"> <li>The positive action statement: We encourage applications from the broadest range of society, including all under-represented groups with particular emphasis on Black, Asian and Minority Ethnic candidates, who are currently under-represented in our University and in comparison, to the sector</li> </ul>
<p><b>Religion and belief</b> (including those without religion or belief)</p>	<p>Buddhist = 11 (8.9fte)  Christian = 426 (349.8fte)  Muslim = 19 (15.5fte)  None = 443 (371.7fte)  Other = 17 (14.9fte)  PRE = 90 (71.8fte)  Spiritual = 17 (13.48fte)</p>	<p>To develop an implementation plan, with EIA to review proposed action, assessing specific impacts of positive /negative impacts.</p>	<p>VCE/VCD/Line managers ( for implementation)</p>	<p>February 2025</p>	<ul style="list-style-type: none"> <li>EDI Policy</li> <li>Inclusivity Statement</li> </ul>

	<p>Positive – strategy is applicable to all colleagues</p> <p>Ensuring fairness and compliance with the legislation of managers across the university – ie access to career development, ensuring belief/religion is not a consideration.</p> <p>Reference to Cathedral group university, and faith within the strategy.</p>				
<b>Sex</b>	<p>Female = 690 (564.4fte) Male = 339 (287.4fte)</p> <p>Positive – strategy applies to all colleagues</p> <p>Ensuring fairness and compliance with the legislation of managers across the university – ie access to career development, ensuring gender reassignment is not a consideration.</p>	<p>To develop an implementation plan, with EIA to review proposed action, assessing specific impacts of positive /negative impacts.</p> <p>As above plus key linkages with Athena Swan action plan (separate EIA).</p>	VCE/VCD/Line managers ( for implementation)	February 2025	<ul style="list-style-type: none"> <li>• EDI Policy</li> <li>• Inclusivity Statement</li> <li>• Athena Swan Action Plan</li> </ul>
<b>Sexual orientation</b>	<p>Positive</p> <p>Bi = 34 (30.6fte) Gay = 16 (14.8fte)</p>	<p>To develop an implementation plan, with EIA to review proposed action, assessing</p>	VCE/VCD/Line managers (for implementation)	February 2025	<ul style="list-style-type: none"> <li>• EDI Policy</li> <li>• Inclusivity Statement</li> </ul>

	<p>Heterosexual = 876 (720.3fte)  Lesbian = 14 (12.6fte)  Prefer not to say = 77 (63fte)</p> <p>Positive – strategy is applicable to all colleagues</p> <p>Ensuring fairness and compliance with the legislation of managers across the university – ie access to career development, ensuring gender orientation is not a consideration.</p>	specific impacts of positive /negative impacts.			
<p><b>Other</b>   <b>(e.g</b>  <b>Internationala,</b>  <b>part-time, fixed</b>  <b>term)</b></p>	<p>Positive – strategy is applicable to all colleagues</p> <p>Consultation included all employees, including our union partners, whose members include colleagues working with UK Right to work Visa, Part-time &amp; fixed term employees</p> <p>Note: concerns raised regarding agile delivery models ( commitment already included in the T2030 over-arching strategy)</p>	To develop an implementation plan, with EIA to review proposed action, assessing specific impacts of positive /negative impacts.	VCE/VCD/Line managers (for implementation)	February 2025	HR team working on employment legislation re prevention of unfair treatment to fixed-term workers and immigration rules

**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?

This EIA will be reviewed in February 2025

EIA will be completed for actions within each implementation plan.

The impact will be measured through employee engagement surveys, turnover absence, exit interview themes, no and type of grievances.

This strategy will be promoted to colleagues including direct feedback from world café sessions. We will the strategy to Sharepoint, as well as on external website.

The strategy includes bi-annual reporting to VCD, JNCC and PPCC

HR monitors reports of any grievances linked to discrimination, bullying and harassment. Exit interviews have an EDI focus to capture relevant staff feedback.

**Step 5:** Final review. Please confirm the lead colleague has reviewed this EIA and is satisfied it can be considered for final consultation/sign-off.

Name:	ZA Pluckrose-Norman	Date:	31 Jan 2024
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**Step 6:** 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:	8 <sup>th</sup> February 2024