

# Equality analysis form

If the activity you are planning to analyse is covered by an existing Equality Analysis or a relevant former Equality Impact Assessment, please use Section 2 of the form to highlight any updated information. The updated form should be sent through to the Equality and Diversity Unit for feedback, the start of the online consultation process and publication.

## Section 1

### Equality Analysis Screening

The following questions will identify whether a full Equality Analysis will be required. Please read the Equality Analysis guidance prior to completing the screening.

1. Name of the activity (strategy, policy, practice etc)

NHS Transition Project – to mitigate against any risks arising from the change of funding or opening up of market competitiveness and to realise the potential benefits of the govt objective to increase recruitment and training of NHS professionals.

2. Will this activity have the potential to deliver positive outcomes for students, staff and/or visitors from equality groups?  
Please provide evidence for your answer.

Yes. The additional funding on offer through a combination of loans from the Student Loans Company and bursaries from NHS Business Systems and UWE during the period of study will increase students' financial viability for that period and therefore increase the opportunity to attend and reduce the need to seek simultaneous employment to supplement personal finances during that period. This should afford a better student experience with more time and less disruptive pressure to studying, therefore raising the potential of academic outcome and attraction to employers beyond.

3. Will this activity have the potential to create negative impacts on students, staff and/or visitors from equality groups?  
Please provide evidence for your answer.

Yes. The 'loan' element of the funding may deter applicants fearing the financial burden and will add an additional financial burden relative to income on equality groups that may be already exposed to wide ranging financial burdens.

Some potential students in equality groups may be estranged from family, or may be less confident in their future earnings, and so may be deterred from taking out a loan.

4. Does the activity have the potential to impact equality groups in the following ways:
- Access to or participation in UWE Faculties or Professional Services?
  - Levels of representation across the UWE workforce?
  - Student experience, attainment or withdrawal?
  - Staff experience?

Please indicate YES or NO. If the answer is YES then a full analysis must be carried out. If the answer is NO, please provide a justification.

Yes:

- The change from bursary scheme to a student loan has the potential to deter potential applicants, particularly those more averse to financial risk, impact on access and participation.
- The change of funding regime offers greater financial support, particularly for those with childcare responsibilities or facing hardship. This offers a potential positive impact on student experience, attainment or withdrawal. A detailed analysis has been carried out by the government as part of implementing these policy changes and can be accessed [here](#).
- No impacts are anticipated on levels of representation across the UWE workforce or staff experience specific to equality groups since the changes are targeting UWE's relationship with students regarding the funding change and employer partners regarding the removal of the cap and placement commissioning constraints.

**Equality analysis screening sign off:**

Faculty Dean or Head of Service	Steven Neill
Faculty / service	HAS
Date	Thursday, 11 May 2017

**Please return the completed form back to the Equality & Diversity Unit for feedback and publication**

## Section 2

### Full Equality Analysis

1. Name of the activity (strategy, policy or practice etc)

NHS Transition project: Reforming healthcare education funding

2. What is the aim of the activity (objective or purpose)?

- enabling universities to offer up to 10,000 extra training places on pre-registration healthcare programmes
- offering students around 25% more upfront financial support while studying - for example, a single student on a 3-year programme would receive approximately £2,000 more each year on a student loan compared to an NHS bursary
- improving access to pre-registration undergraduate study for those from disadvantaged backgrounds
- giving students with an existing qualification the chance to get funding for a second degree

[Policy paper](#)

3. If amending a current activity, what changes are proposed?

From 1 August 2017, new nursing, midwifery and most allied health students will no longer receive NHS bursaries. Instead, they will have access to the same [student loans system](#) as other students. This applies to new students on pre-registration courses (those which lead to registration with one of the health professional regulators).

Students who already have a degree and are planning to undertake a nursing, midwifery or allied health profession subject as a second degree will now also have access to student loans through the student loans system.

Courses affected:

- Nursing (adult, child, mental health, learning and disability)
- Midwifery
- Dietetics
- Occupational therapy
- Orthoptics
- Orthotics and prosthetics
- Physiotherapy
- Podiatry/chiropractic
- Radiography (diagnostic and therapeutic)
- Speech and language therapy
- Operating department practitioner

**This change applies only to new students.**

#### 4. Who is responsible for developing and delivering the activity?

- Higher Education England (HEE)
- The Student Loans Company
- NHS Business Systems
- Higher Education Institutions

At UWE, the responsibility lies with the NHS Transition Project. The Lead sponsor is Marc Griffiths (Associate Dean for Resource and Planning (HAS)). The project manager is Dominic Foster (HAS).

#### 5. What measures will be used to assess whether the activity is successful?

- Registration, continuation, Good Honours, and NSS results across the following demographics:
  - Gender
  - Disability Group
  - Ethnic Origin Group

- LPN (using Polar 3 classification)
- NHS recruitment audits

6. Does the activity have a potentially adverse impact on equality groups, in terms of employment issues and/or service delivery for students and/or staff? In the table below, please give evidence to support your yes or no answers. If the answer is not known, indicate how you will source evidence.

**Meeting the public sector equality duty**

Please also use the table below to demonstrate whether the activity has the potential to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. Please use the ‘no’ column to highlight your responses.

	Yes	No	Not known
<b>Women and men</b>		These programmes historically attract a greater of female students.	✓
<b>Trans people</b>		Trans people may become estranged from their families, and may be averse to taking out a loan. Supplementary to the maximum loans to cover full fees and £8,200 pa for maintenance, UWE offers an additional non-repayable bursary of £3,000.	
<b>Black and minority ethnic groups</b>		Those from BME groups may opt for University courses where employment leads to higher remuneration and career progression. Impending Brexit raises the risk of EU students losing access to the Student Loans as well as having lost access to NHS Bursaries. Currently the UK government having confirmed continued access for 17/18 registration and continued access for that cohort for the duration of their course. UWE offers a <a href="#">web page dedicated to funding information for EU students</a> .	

<b>Disabled people</b>		Although the Govt impact assessment highlights the retention of some DSA funding for the SLC regime as the Bursary regime, there are DSA cuts to Bands 1 & 2.	
<b>Younger or older people</b>		<p>Younger people may opt for Nursing Associate or Nursing Apprenticeship Roles – which will delay the pipeline onto Nursing programmes.</p> <p>Mature people may feel disinclined to access loans and taken on perceived debt.</p>	
<b>People of different religion and beliefs</b>		<p>People of certain faith may be disinclined to enter these professions due to issues facilities in practice, for example, for prayer and also adaptable uniforms.</p> <p>People of different religions &amp; beliefs may become estranged from their families, and may be averse to taking out a loan. Supplementary to the maximum loans to cover full fees and £8,200 pa for maintenance, UWE offers an additional non-repayable bursary of £3,000.</p> <p>There is an unquantified risk some Muslims following strict Shria law will not take out a loan because of the interest to pay on that loan.</p> <p>The DfE (and BIS as was) have been developing an alternative system of student finance which meets Islamic finance principles since about 2010 - interest was charged on pre-2012 loans, but at a rate that matched inflation, as measured by RPI – this was generally seen as acceptable as it merely maintained the value of the loan, but the new system of inflation plus up to 3% was definitely not. Note also this is an issue in England and Wales, as Scotland and NI have retained the inflation only interest rate. Wales is not scrapping its NHS bursary system, so this will not be a specific point in Wales either. The main difficulty is creating a system which neither advantages nor disadvantages those that choose to take it up (it wouldn't</p>	

	<p>and couldn't be restricted to Muslim students), when the conventional system has an income-contingent repayment system and a variable interest rate. Eventually a workable approach using the 'Takaful' model was developed. BIS ran a consultation on this in 2014, where the overwhelming response was positive:  <a href="https://www.gov.uk/government/consultations/sharia-compliant-student-finance">https://www.gov.uk/government/consultations/sharia-compliant-student-finance</a></p> <p>The issue since is that the Secretary of State has no legal powers to offer any alternative to the conventional system, and BIS were unable to secure a legislative vehicle until the HE and Research Bill was introduced last year. With all the discussion and debate about TEF, the Office for Students and so forth, it's slipped under the radar, but Part 2 of the Bill gives the SoS that power. Assuming the Bill passes, given systems development time it will be 2018/19 at the earliest before they will be available, so there will be an issue for healthcare courses in 2017/18 at least.</p> <p>There's not a vast amount of actual data on Muslim students and loans – the official response to the consultation linked above summarises what's available. Indeed, some evidence (not, it should be said, the most robust) from the time that loans in FE were introduced suggested that this may be an issue of assuming a problem for others rather than experiencing one for yourself: that is to say that Muslim learners surveyed were more likely to say they themselves wouldn't be deterred from taking out loans but that they worried other Muslim learners would be – see p15 here:  <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/32282/12-795-attitudes-to-further-education-loans.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/32282/12-795-attitudes-to-further-education-loans.pdf</a></p> <p>There are some charities and small scale schemes that have tried to help some Muslim students in the absence of a comprehensive alternative product, but the costs and numbers involved mean these really can only ever be small scale. (Source: Claire Herbert, Race Equality Charter Manager at the Equality Challenge Unit)</p>	
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<b>Lesbian, gay, bisexual people</b>		LGB people may become estranged from their families, and may be averse to taking out a loan. Supplementary to the maximum loans to cover full fees and £8,200 pa for maintenance, UWE offers an additional non-repayable bursary of £3,000.	
<b>Marriage and civil partnership</b>			✓
<b>Pregnancy and maternity</b>		The lack of maternity pay, as is under the current system, may dissuade women of child bearing age to apply.	

7. Please give evidence of how you have engaged equality groups in the equality analysis process. Is further engagement required?

Consultation included:  
 Rakhee Rankin - Widening Participation Lead for Nursing and Midwifery and BME Lead for the Faculty  
 Mandy Bancroft - Faculty Lead for Widening Participation  
 Suzanne Carrie – Head of Student Inclusivity, DirVC  
 Simon Phillips – Head of Student Support and Wellbeing  
 See more info under the next section, in the paragraph beginning ‘Through the stages of the application...’

8. What action can be taken to mitigate any potential negative impacts or address different needs? Please comment and then complete an action plan (see appendix 1).

- A detailed analysis has been carried out by the government as part of implementing these policy changes, including planned mitigation, and can be accessed [here](#).
- In addition, the change of funding regime enables access to further UWE bursaries these students were previously unable to access due to their funding status, which will reduce the stress of financial sustainability during the period of study.
- The HAS Faculty has committed to covering additional student costs for DBS, OH and uniforms for the first year of transition, 17/18, which many HEIs are passing onto their students. 18/19 is under review.
- Through the stages of application, the project team have made extensive efforts to communicate a consistent and clear message on the implications of the funding changes, as well as all supplementary support, from outreach events in schools and colleges, an applicant’s initial search of course information on the web, to funding-specific presentations, money advice helpdesk, and clearly briefed academic staff and student ambassadors for Open Days, to a repeat of these activities and services for selection days. Faculty staff have

been involved in Outreach events seeking to recruit new students for 17/18 and as a part of those events we have been supported by additional professional service people with a specific aim this year to deliver a clear and consistent funding change message. These events target BME applicants amongst mature and LPN groups. Also, at applicants attending Open Days were offered presentations on the implications of funding changes where they were also invited to attend the Money Advice team at the Open Day to investigate the implications according to their specific circumstances. The message was also delivered to careers staff from Schools & Colleges at Taster Days, and to the applicants as they attended selection days.

- UWE is in the process of implementing [a project to mitigate against the cuts to DSA Bands 1 & 2 funding as well as anticipated future cuts to Bands 3 & 4](#). As students identify themselves as having a disability to the Disability unit, they will be informed and begin to be guided through the means of assistive technologies, advanced notice of academic materials, and the community of collective note-taking.
- The Student Union are included in briefing and consultation sessions on actions taken by the university in response to the changes.
- As part of the Student Experience, the university will seek to identify value for money ...

9. Please indicate the level of equality relevance:

High

Medium

Low

10. **Equality analysis sign off:**

Faculty Dean or Head of Service	Steven Neill
Faculty / service	HAS
Date	Thursday, 11 May 2017