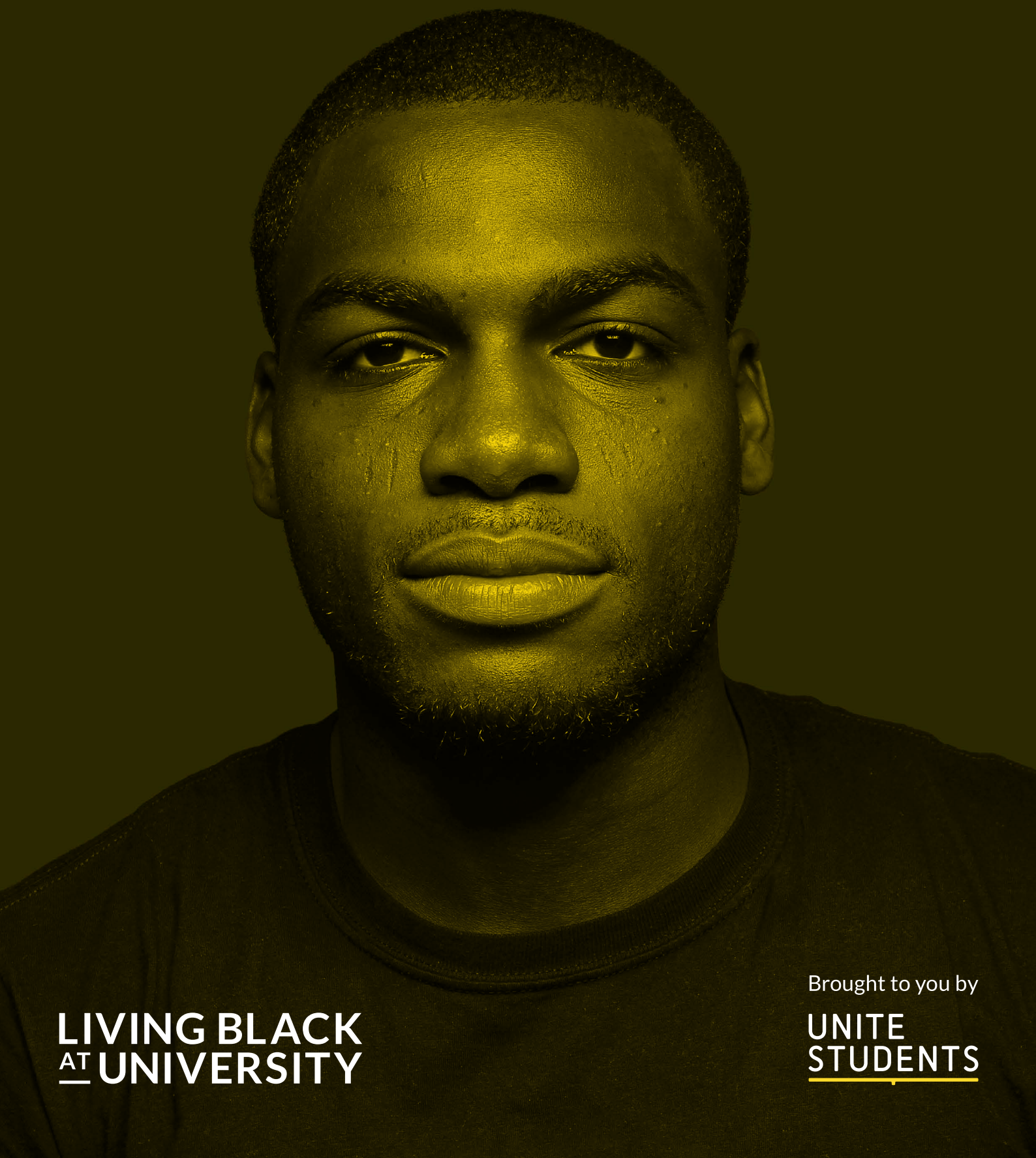# EQUALITY, DIVERSITY, AND INCLUSION DATA MATURITY FRAMEWORK

## A change model for Higher Education Institutions

*by Dr Nick Cartwright*

**LIVING BLACK AT UNIVERSITY**

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# Introduction

Dr Nick Cartwright

**Maturity frameworks have existed since the late 1990s for different activities such as software engineering and HRM.[i] Their biggest strength is also their key limitation, this being their simplicity.[ii] Simplicity allows for a framework that has use in a variety of circumstances and organisations; however, it also allows for interpretation in its application and, some have argued, a tendency to be overly generous in self-assessment.[iii] This means that this framework includes useful examples but not all will be relevant to all institutions and cannot be relied upon as if they were advice.**

In 2022, Halpin applied the principles of Maturity Frameworks to Equality, Diversity, and Inclusion (EDI) in HE[iv] and in the same year I built on this and developed this EDI Data Maturity Framework. The need for such a framework was made clear during a discussion at the Unite Students Commission on Living Black at University. As Commissioners addressed the findings and recommendations of the Living Black at University report,[v] data issues presented barriers. Some of these barriers were explicit – the difficulties that some accommodation teams faced in accessing data on the protected characteristics of their resident students, for example. Others were more subtle, such as a lack of data-informed proactive approaches to recruitment of staff from diverse backgrounds.

These are institutional-level issues that require institution-level approaches, and with that in mind, the scope of this model encompasses every part of the institution. However, in the interests of helping to create useful change I have also provided a non-exhaustive list of application of the framework to aspects of Higher Education Institutions' activities. These are examples of what practice might look like and it is recognised that they will not all be applicable to all institutions in all circumstances – they certainly should not be read as a form of one-size-fits-all advice, but I sincerely hope that they encourage action.

While I hope that this model, and its examples, are useful to institutions across the breadth of EDI work, the impetus for creating this model has come from a specific issue – the experience of Black students in student accommodation as revealed by the Living Black at University report. The examples speak to many of the report's recommendations, for example on allocations, complaints and staff representation, and provide models of practice that might enable those recommendations to be fully adopted. It is of course true though that not all examples will be relevant to all institutions.

[i]Neely, A. and Al Najjar, M., 2006. Management learning not management control: the true role of performance measurement?. *California Management Review, 48*(3), pp.101-114.

[ii]Becker, J., Knackstedt, R. & Pöppelbuß, J. Developing Maturity Models for IT Management. *Bus. Inf. Syst. Eng*. 1, 2–222 (2009).

[iii]"Tech companies tell DoD its new cyber standards are missing the mark". *Federal News Network*. March 27, 2020. Retrieved October 9, 2022

[iv]Cartwright, T., EDI Maturity Framework. Halpin Partnership (forthcoming)

[v]The Halpin Partnership, *Living Black at University* (Unite Students)

*As a sector we are slowly coming to terms with the extent of endemic and structural inequalities whilst at the same time dealing with the new challenges of emerging from a global pandemic.*

For accommodation professionals I would particularly recommend the examples on Staff experience, Accommodation allocation, Retention, Disciplinary/grievance, Residential life, and Culturally relevant services. Underpinning this is a need for maturity in the approach to data sharing across the institution, the lack of which is currently a known barrier for some accommodation teams. I hope these examples will empower accommodation leaders and their teams to evaluate their institution's level of data maturity in each of these relevant areas, and to work with senior leadership and colleagues across the institution to make changes that will help bring about a more inclusive environment for resident students. It is not expected that many, if any, institutions, would currently score highly on the framework. As a sector we are slowly coming to terms with the extent of endemic and structural inequalities whilst at the same time dealing with the new challenges of emerging from a global pandemic in a period of recession. In my experience the best institutions are those that recognise the problems, and the enormity of the task we all face, whilst the worst are still pretending that these problems do not exist or are not our responsibility.

The scope of the examples do not currently extend beyond the walls of Higher Education Institutions (HEI), and yet we know that more than half of Purpose-Built Student Accommodation (PBSA) is now managed by the private sector. However, the principles of the model apply to any organisation, and a future phase of this work could see universities and their accommodation partners discussing how to implement the model in partnership.

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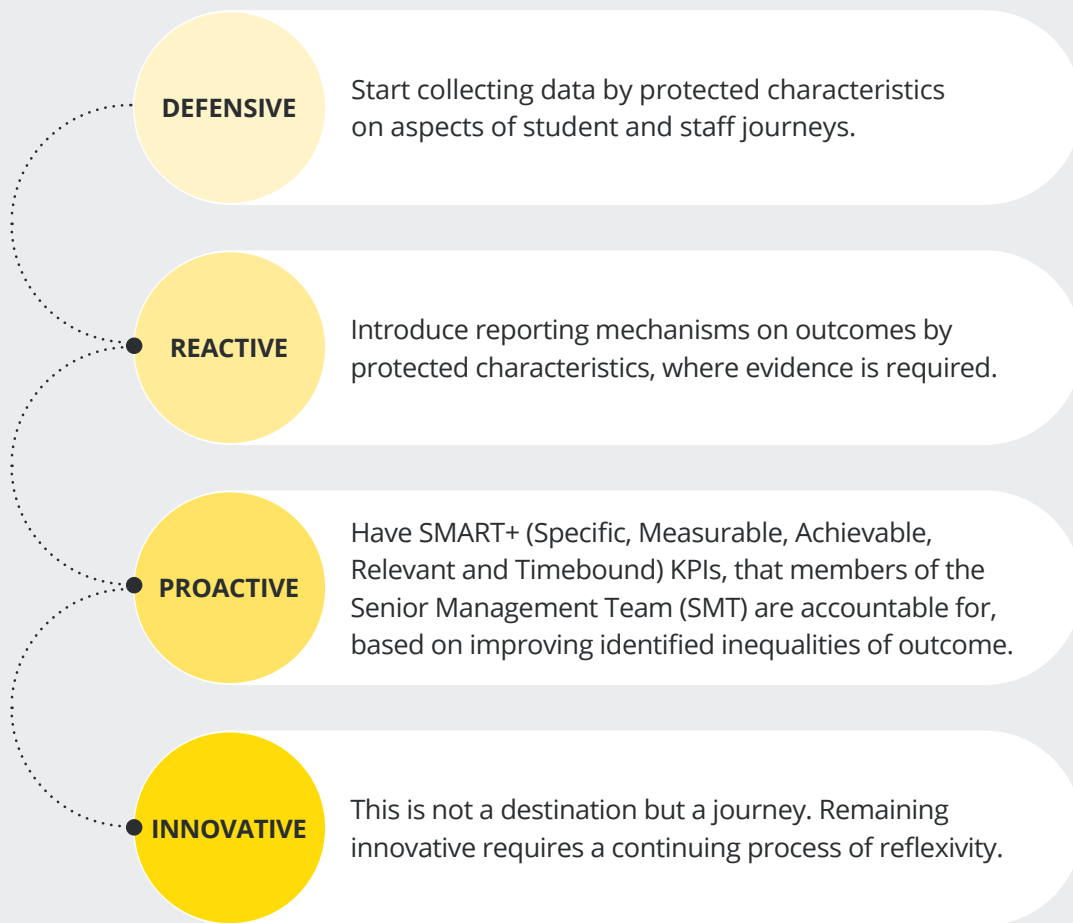
# EDI Data Maturity Framework

| | DEFENSIVE | REACTIVE | PROACTIVE | INNOVATIVE |
|---|---|---|---|---|
| **Attitudes** | It is assumed that everything is okay, and data is only collected when required.<br><br>There is a suspicion that when data is requested it will not be used to benefit the institution. | Data is not actively sought but when it is available, and indicates a problem, it is discussed. | Before big decisions are made, some data is sought and this is discussed as part of the decision-making process. | Actively seeks data about all aspects of the organisation to hunt out inequalities with a view to remedying them. |
| **Behaviours** | Data is collected and reported as required by statutory obligations.<br><br>Requests for data are often refused.<br><br>Data on protected characteristics is not routinely collected. This means Freedom of Information (FOI) requests can be refused on the grounds that it would take too much time to collate the data. | Where data indicates an inequality, action may follow.<br><br>Requests for data are treated with scepticism.<br><br>Data on protected characteristics may be stored separately from other data, making analysis time-consuming and complex. | Collecting and responding to data on EDI gaps is a formal part of quality processes.<br><br>Requests for data are responded to positively.<br><br>Data on protected characteristics is routinely recorded in data sets or, when anonymised, a system of EDI monitoring runs in parallel and is monitored. | Collecting and responding to data on EDI gaps is part of the ongoing processes at every level.<br><br>There is a presumption in favour of publishing data and sharing it with staff at the institution.<br><br>Responding to/ explaining any inequalities of outcome in data is required whenever data is presented. |
| **Examples[vi]** | Where data indicates potential EDI issues, it is seen as a PR problem and 'explained' or justified. Reference is often made to sector-wide or societal issues. | If data in an Equality Impact Needs Assessment (EINA) highlights an inequality it is discussed but it is not seen as necessary to change anything. | The impact of policies and procedures is continually monitored through data analysis. This data is shared with employee and student representatives.<br><br>EINAs are required for all new and updated policies and procedures. | The data on who accesses services such as student support is continually monitored by protected characteristic and evaluated. The institution is responsive to issues.<br><br>Where the institution receives complaints it monitors these, and outcomes, by protected characteristics.<br><br>The institution takes ownership when there are inequalities of outcome and does not adopt a deficit model or victim blaming approach. |

[vi]Throughout this framework examples are used to illustrate underlying themes and principles. These examples may not be relevant to all institutions or all circumstances and are not intended to be relied upon as if they were advice. Anyone using the examples to inform practice should also carry out their own EINA and seek legal advice as appropriate.

The purpose of a Maturity Framework is two-fold in that not only does it indicate where an institution or individual is on their journey, but it also drives continuous improvement.[vii] Perhaps counter-intuitively, it is the second of these purposes that is the most important, with the first being necessary to this aim.

The table below, shows how a HEI might move from one stage of the framework to the next through indicative actions – this is intended to aid development. The boxes give examples of indicative behaviours that would support progression from one stage of the framework to the next.

**DEFENSIVE** — Start collecting data by protected characteristics on aspects of student and staff journeys.

**REACTIVE** — Introduce reporting mechanisms on outcomes by protected characteristics, where evidence is required.

**PROACTIVE** — Have SMART+ (Specific, Measurable, Achievable, Relevant and Timebound) KPIs, that members of the Senior Management Team (SMT) are accountable for, based on improving identified inequalities of outcome.

**INNOVATIVE** — This is not a destination but a journey. Remaining innovative requires a continuing process of reflexivity.

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[vii]Pfeffer, J. and Sutton, R.I., 1999. Knowing "what" to do is not enough: Turning knowledge into action. *California Management Review*, 42(1), pp.83-108.

The following sections give examples of practice for specific areas of activity under each of the maturity stages. The examples should be read as developmental, for example the 'innovative' institution would be expected to have met or exceeded the indicative descriptors in the other boxes.

# Staff experience

| AREA OF ACTIVITY | DEFENSIVE | REACTIVE | PROACTIVE | INNOVATIVE |
|---|---|---|---|---|
| **Attraction** | Advert placement is not data-led. | Where there is underrepresentation of a specific group in the workforce, advert placement is evaluated and positive action statements are considered. | Actively seeks staff from underrepresented backgrounds through, for example, advert placement and positive action. | Uses data to identify areas of underrepresentation and has KPIs around diversity of workforce, including at senior levels. |
| | Applicants' explicit requests for reasonable adjustments are considered against the needs of the business. | Equality Monitoring Data is used to identify individual needs and reasonable adjustments. | Equality Monitoring Data is used to predict the most common reasonable adjustments and these are made for all applicants. | Tie-break provisions (s.159 Equality Act (2010)) and positive action are utilised where data shows underrepresentation. |
| **Equality monitoring** | There is a high proportion (i.e. >90%) of staff who refuse to disclose (i.e. 'prefer not to say') data relating to one or more protected characteristics. | For each protected characteristic where there is a high number of staff who refuse to disclose there are SMART+ actions required of the organisation. | The HEI regards disclosure rates as an indicator of trust and acknowledges that a lack of trust is likely to be indicative of cultural issues within the HEI, for example homophobia. | There is a high level of disclosure (i.e. >25%) indicating a high degree of trust towards the HEI. The HEI uses Monitoring Data in a responsible manner to maintain trust and therefore high disclosure rates. |

| AREA OF ACTIVITY | DEFENSIVE | REACTIVE | PROACTIVE | INNOVATIVE |
|---|---|---|---|---|
| **Recruitment** | Equality data is not part of the recruitment process, often against a narrative of 'wanting the best person for the job.' | Those involved in recruitment activities will usually have undertaken some form of 'unconscious bias' training and there are tick-boxes to check that equality data has been given 'due regard'. | Individuals from underrepresented backgrounds are offered the option of positive action, for example a guaranteed interview for disabled applicants. | Each stage of the recruitment process, such as shortlisting, is monitored for equality of outcome and if an inequality occurs at any stage HR will halt the process and investigate. |
| | Where market supplements are offered there is no Equality Impact Needs Assessment (EINA) of this decision. | EINAs of the policies and procedures around the offering of market supplements are completed when the policies are due for re-approval. | Market supplements are monitored by protected characteristic. Positive action to encourage applicants from underrepresented backgrounds will be used where an inequality is identified. | Market supplements are monitored by protected characteristic and will not be offered where it would perpetuate inequality of outcome. |
| **Probation** | Equality data on the probation process is not monitored, often against a narrative of 'treating everyone the same.' | Equality data on completion of probation by some protected characteristics is recorded. | Equality data on completion of probation by some protected characteristics is monitored and reported. | Where the data shows an inequality of outcome by protected characteristic for completion of probation within any School, Faculty or Department HR will investigate. |
| | Staff on probation who feel that they have been discriminated against are able to bring a grievance or appeal the process. | The right to raise a grievance or appeal the process is explicitly written into the probation policy and staff who have probation extended or do not pass probation are made aware of this. | Where the data shows an inequality of outcome by protected characteristic for completion of probation within any School, Faculty or Department this is recorded. | Where longitudinal data shows a persistent inequality of outcome the presumption will be that this is evidence of institutional or systemic discrimination and action taken. |

| AREA OF ACTIVITY | DEFENSIVE | REACTIVE | PROACTIVE | INNOVATIVE |
|---|---|---|---|---|
| **Retention** | Low retention rates are explained without reference to EDI data. | EDI data is monitored to identify any patterns of retention by protected characteristic. | Managers are required to report on retention rates by protected characteristics and identify SMART+ actions where there is inequality of outcome. | High retention rates are expected, and the data is monitored as part of governance procedures. This includes EDI data. |
| **Reasonable adjustments** | Where reasonable adjustments are explicitly requested then this is considered on a case-by-case basis, taking account of the other needs of the business. | Where Equality Monitoring Data shows a declared disability, the HEI is proactive in asking if the employee needs any reasonable adjustments. | EDI data is used (through EINAs) to guide decisions on procurement, renovation etc., so that the majority of staff need is met without the need for reasonable adjustments. | Reasonable adjustments are seen as a last resort with a focus on creating accessible working environments that cater for diversity as a default. |
| **Development opportunities** | Development opportunities are offered equally to all permanent staff regardless of protected characteristic. | Policies exist that ensure development opportunities should be made available to those on non-permanent or fractional contracts. | Engagement with Continuing Professional Development (CPD) is monitored against protected characteristics and reported on through committee structures. | Engagement with CPD is monitored against protected characteristics and SMART+ actions adopted where there is under-engagement of any particular group. |
| | | | | Awarding data for internal schemes such as Postgraduate Certificate Academic Practices (PGCAPs) or accredited Fellowship schemes is monitored and Annual Reviews must respond to any awarding gaps. |
| **Remuneration** | The legal requirement to report on the Gender Pay Gap is met. | Data on Pay Gaps for gender, ethnicity and disability is published. | There are SMART+ actions to reduce pay gaps. | There are KPIs to close pay gaps by fixed dates, with key power holders held accountable. |

| AREA OF ACTIVITY | DEFENSIVE | REACTIVE | PROACTIVE | INNOVATIVE |
|---|---|---|---|---|
| **Disciplinary/ grievance** | Data on who is facing disciplinaries and raising grievances is not monitored by protected characteristic. | Data on who is facing disciplinaries and raising grievances is monitored by protected characteristic. Inequalities in the data are often explained with reference to the validity of individual cases, ignoring patterns in the data. | Data on who is facing disciplinaries and raising grievances is analysed by protected characteristics. Inequalities in the data are investigated. | Data on the outcomes of disciplinaries and grievances is also analysed by protected characteristics. |
| | The institution is defensive when criticisms or complaints are raised, this is reflected in the way data is recorded and reported. | | The presumption in favour of believing victims is embedded in policies and reflected in the way data is recorded and reported. | Where there are inequalities in the data, the presumption is that this represents an institutional issue as opposed to victim-blaming. |
| **Senior Management Team (SMT)** | SMT make tokenistic, performative gestures with claims about EDI that are not evidenced by data. | SMT focus on positive data and ignore negative data. There is a culture of celebrating diversity without evidence of a commitment to enhancing EDI. | SMT develop SMART+ objectives around advancing EDI, some of which are reflected in organisational KPIs. | SMT are held directly accountable for inequalities of outcome in data. |
| | | | | There are KPIs which relate to data on reducing inequality of outcome and members of SMT are responsible for achieving these. |

# Student journey

| AREA OF ACTIVITY | DEFENSIVE | REACTIVE | PROACTIVE | INNOVATIVE |
|---|---|---|---|---|
| **Societies** | Membership of societies is not monitored by protected characteristic. | There is a range of societies designed to appeal to students who share certain characteristics. This however is not data-led. | Data on engagement with societies and events is monitored and reacted to. | The Students' Union is financially incentivised to evidence, with data, that their societies and events are used proportionately regardless of protected characteristic. |
| **Applications** | Access and Participation Plans (APPs) draw on evidence, including Equality of Opportunity Risk Register (the EORR), to meet the minimum requirements of the Office for Students (OfS). | The EORR is used to design Widening Participation initiatives and justify APPs. There is some internal evaluation of the effectiveness, but this is often lacking in data. | Additional data on protected characteristics is used, in addition to the EORR, to design Widening Participation initiatives and justify APPs. Evaluation is designed into interventions at an early stage to assess effectiveness. | Widening Participation initiatives and APPs are designed using a recognised methodology, such as Theory of Change, which designs in evaluation. Standards of evidence based on the OfS data hierarchy are considered as part of the design and evaluation process. |
| **Admissions & recruitment** | There is an assumption that lowering admissions requirements aids Widening Participation and this drives admissions policy more than data. | Admissions data is monitored by protected characteristic and route into higher education, for example BTEC or Access Courses. | Admissions decisions including contextualised admissions are driven by data on protected characteristic and route into higher education, for example BTEC or Access Courses. | The diversity of the home student population reflects the diversity of the UK general population. |

| AREA OF ACTIVITY | DEFENSIVE | REACTIVE | PROACTIVE | INNOVATIVE |
|---|---|---|---|---|
| **Accomodation allocation** | Accommodation allocation is on a first-come, first-served basis (or similar), often leading to unintentional segregation. Data on protected characteristics is not part of the allocation process. | Limited data on protected characteristics is collected – this is defended with references to GDPR and/or data privacy. This data is used in allocation decisions. | Data is collected on protected characteristics, and this is part of the decision-making process for accommodation allocation, for example data on gender identity and sexuality is used sensitively to ensure students are housed in a safe and welcoming environment. | Data on protected characteristics and intersectionality and is collected and this is used to make nuanced and sensitive decisions on accommodation allocation. |
| | | | Data on the protected characteristics of students applying for accommodation is collected and compared to that of the whole student body. This is used to improve marketing of accommodation to students who are underrepresented. | Data is used alongside qualitative research to understand why some students prefer not to live in student accommodation, and SMART+ objectives are set to address the issues raised. |
| **Portfolio review** | The appeal of certain modules or programmes to small groups of students who share protected characteristics is not considered in portfolio review. | Data on current student preference is collected as part of the portfolio review and used to justify certain decisions. | Data on current and future student preference is collected as part of the portfolio review and influences decisions. | Data on the appeal of modules or programmes to underrepresented and minoritised groups, including those not currently accommodated, is at the centre of portfolio review. |

| AREA OF ACTIVITY | DEFENSIVE | REACTIVE | PROACTIVE | INNOVATIVE |
|---|---|---|---|---|
| **Academic Misconduct** | Data on referrals for Academic Misconduct is not collected by protected characteristic. | Data on referrals for Academic Misconduct is available by protected characteristic but is not routinely shared. | Data on referrals for Academic Misconduct is analysed by protected characteristic and deficit model interventions justified by the data, for example cultural acclimatisation. | Data on referrals for Academic Misconduct is analysed by protected characteristic and innovative interventions that move away from deficit model to evidence-based solutions are implemented. |
| **Retention** | Retention is seen as a universal issue and universal responses such as Personal Tutoring are developed. Data is not routinely checked to look for inequalities of outcome. | Data on retention is used to identify at risk groups by protected characteristics. Deficit model interventions such as resilience training are developed for at risk groups. | Data on retention is used to identify at risk groups by protected characteristics. Institutional efforts are made to remove barriers that impact at risk groups. | Meaningful attempts are made to collect exit data from students who have withdrawn. The scope of this exit data is broad, including non-academic factors such as extra-curricular engagement and accommodation experience where relevant. The findings are used to inform SMART+ KPIs and objectives across multiple departments. |
| | Data on termination by protected characteristic is not collected. | Data on termination by protected characteristic is not routinely evaluated to check for inequalities of outcome. | Data on termination is collected by protected characteristics. | Data on termination is collected by protected characteristics and any inequalities of outcome lead to SMART+ objectives to eliminate them. |

| AREA OF ACTIVITY | DEFENSIVE | REACTIVE | PROACTIVE | INNOVATIVE |
|---|---|---|---|---|
| **Progression** | Intermediate Awards such as Certificates and Diplomas of Higher Education are used with a clear aim to improve data on non-progression. | Progression data is collected by protected characteristic, but the institutional focus is on Graduate Outcomes (GOs). | Progression data is used in combination with GO data to identify awarding gaps. | There are SMART+ objectives on progression by protected characteristics that relate to institutional KPIs. |
| **Graduate outcomes** | The institution has non-specific targets for reducing what they describe as Attainment Gaps. | The institution has non-specific targets for reducing what they describe as Awarding Gaps. | The institution has SMART+ objectives for reducing what they describe as Awarding Gaps. | The institution has ambitious SMART+ objectives for eliminating what they describe as Awarding Gaps that relate to institutional KPIs. |
| **Graduate destinations** | Initiatives to improve Graduate Destination data are aimed at all graduates. | The institution has non-specific targets for reducing 'gaps' in graduate destination data. | The institution has SMART+ objectives for reducing 'gaps' in graduate destination data. | The institution creates funded opportunities for students from underrepresented backgrounds to progress to level 7 and 8 study. |
| **Student voice** | The institution has a system of Student Representatives who represent the interests of all students in Student Staff Liaison Committees. | The institution encourages students from underrepresented and minority backgrounds to apply for Student Representative roles, seeking (for example) gender balance. | Representatives from underrepresented and certain minoritised backgrounds have an explicit role in Student Staff Liaison Committees, for example EDI Reps. | Representatives from underrepresented and certain minoritised backgrounds are employed (paid) by the institution, for example Black Student Advocates. |

| AREA OF ACTIVITY | DEFENSIVE | REACTIVE | PROACTIVE | INNOVATIVE |
|---|---|---|---|---|
| **Disciplinary/ grievance** | Data on who is facing disciplinaries and raising grievances is not monitored by protected characteristic. | Data on who is facing disciplinaries and raising grievances is monitored by protected characteristic. | Data on who is facing disciplinaries and raising grievances is analysed by protected characteristics. This includes data on the informal stages of the grievance procedure. | Data on the outcomes of disciplinaries and grievances is also analysed by protected characteristics. SMART+ actions follow when inequalities of outcome are identified. |
| | | Inequalities in the data are often explained with reference to the validity of individual cases, ignoring patterns in the data. | Inequalities in the data are investigated. | |
| **Security** | The institution is defensive when criticisms or complaints are raised, which reflected in the way data is recorded and reported. | Data on serious incidents is recorded and analysed by protected characteristics. This is used to profile certain groups of students and design targeted interventions. | The presumption in favour of believing victims is embedded in policies and reflected in the way data is recorded and reported. | Where there are inequalities in the data the presumption is that this represents an institutional issue as opposed to victim-blaming. |
| **Student Support** | Data on who accesses Student Support by protected characteristics is not collected. | Data on who accesses Student Support is collected and analysed by protected characteristics. | Student Support services are promoted to groups who underutilise them. | The institution knows who accesses Student Support services and what the learning gain is for each group by protected characteristic. This is used to develop services. |

| AREA OF ACTIVITY | DEFENSIVE | REACTIVE | PROACTIVE | INNOVATIVE |
|---|---|---|---|---|
| **Residential Life** | Data on who engages with Residential Life services is not broken down by protected characteristics. | Residential Life services and activities are informed by the protected characteristics of the resident students. | Engagement with Residential Life services and activities is monitored and reacted to. | Engagement with Residential Life services and activities are used, in consultation with students themselves, to set and work towards outcomes-based objectives. |
| **Engagement monitoring** | Software is used to analyse engagement data and provide a dashboard identifying students who have low engagement. Individualised responses follow from the data. | Engagement data is analysed by protected characteristics to identify any patterns by protected characteristics. | Engagement data is analysed by protected characteristics and other characteristics, such as caring responsibilities and commuter status, to identify any patterns by protected characteristics. | Where there is poor engagement with certain activities by protected or other characteristics, the institution looks at changing the activity, not the individual, such as changing timings or making the activity more relevant. |
| **Timetabling** | Timetabling is led by the physical constraints of the estate. | Where data shows that there are students with specific characteristics, essential activities are not timetabled at these times – for example, lectures are not scheduled during Friday Prayers. | Data on who our students are is used to create a suitable timetable, for example those with childcare responsibilities are timetabled within core hours. | Timetabling policies accommodate the needs of those with childcare responsibilities and commuting students. |

| AREA OF ACTIVITY | DEFENSIVE | REACTIVE | PROACTIVE | INNOVATIVE |
|---|---|---|---|---|
| **Culturally relevant services** | The institution concerns itself solely with the services it provides. | Data on student population is used to invite providers of culturally relevant services to have stalls at events like Welcome Week. | Data on student population and analysis of the local provision of culturally relevant services is used to provide guides for students. | Data on student population and analysis of the local provision of culturally relevant services is used to identify needs/gaps and these needs are then provided for by the organisation. |
| **Data requirements** | Systems require data that creates discomfort for some with protected characteristics, for example demanding a 'title' of Mr/Miss/Mrs. | Systems allow for 'other' options such as Mx. | Where data is deemed necessary only the minimal data is shared outside of confidential systems. For example, 'title' does not appear on class registers. | Assumptions that normalise certain protected characteristics, for example heteronormative assumptions, are not made in data collection. |
| | Unnecessary data is often collected such as relationship to emergency contact forcing the disclosure of, for example, sexuality. | Students can select the option 'data refused' to avoid revealing unnecessary sensitive data. | Only necessary sensitive data is collected. | Anyone collecting data, for example consent for a fieldtrip, is required to justify all fields to ensure they are necessary. |
| | Data categories developed by government agencies such as the ONS, are adopted. | Data categories developed by government agencies, such as BME or BAME, are adopted unless challenged. | Data categories developed by government agencies are checked for problems, such as the absence of 'Mixed' categories, and allowing '... and Black British'. | Data categories are developed in collaboration with those from underrepresented and minoritised backgrounds to ensure they are described in a way they are comfortable with. |

# Departments

| AREA OF ACTIVITY | DEFENSIVE | REACTIVE | PROACTIVE | INNOVATIVE |
|---|---|---|---|---|
| **Library & learning services** | Use of library services is not monitored by protected characteristics.<br><br>Certain resources are highlighted during certain events such as Black History Month. | Use of library services is monitored by protected characteristics. | Use of library services is monitored and analysed by protected characteristics. This data justifies passive initiatives to improve engagement for certain groups, for example Pride book displays. | Use of library services is monitored and analysed by protected characteristic. SMART+ actions are developed around groups with low engagement. |
| **Finance** | Finance data is not collected by protected characteristic. | Finance data is collected by protected characteristic. | Finance data is collected and reported by protected characteristic. | Data on debtors, including accommodation arrears, is analysed by protected characteristic and intersectionality is used to identify need and target additional support. |
| **Human Resources (HR)** | EINAs are not required for all policies and procedures. | EINAs are required for all new policies and procedures and updates. | EINAs are required for all new policies and procedures and updates. Where an EINA identifies an inequality action is required. | Consultation is carried out with those with protected characteristics to anticipate any inequalities prior to policies and procedures being adopted. |

| AREA OF ACTIVITY | DEFENSIVE | REACTIVE | PROACTIVE | INNOVATIVE |
|---|---|---|---|---|
| **IT** | IT data is not collected by protected characteristic. | Data on who accesses IT support is collected by protected characteristic. | The institution has systems in place to collect data on digital literacy and digital poverty. | The institution collects and responds to IT usage data and data on digital literacy and digital poverty. |
| **Learning & Teaching (L&T)** | Data is not considered in L&T design. | EINAs are required for all L&T policies and changes to the L&T strategy. | Funded innovative teaching projects and L&T research require ethical approval, including EINAs, as part of the risk assessment. | L&T policies, strategies and design embed praxis that reflects the needs of those with protected characteristics and those from underrepresented backgrounds. |
| **Quality Assurance (QA)** | External Examiners and other external committee members may raise EDI issues. | EDI is a standing item on QA agendas. | There is a formal position for EDI rep(s) on QA panels. | Exam boards and Periodic Subject Reviews (PSRs) are required to consider and respond to any retention, progression, and awarding gaps. |

# Data sharing

| AREA OF ACTIVITY | DEFENSIVE | REACTIVE | PROACTIVE | INNOVATIVE |
|---|---|---|---|---|
| **Data sharing** | Data on protected characteristics of students and staff is siloed and may not be available to some departments with a legitimate interest. Requests from departments may be denied or delayed, citing data protection. | Subject to GDPR (General Data Protection Regulation and other Data Protection legislation) data on protected characteristics is made available to all departments on request for specific purposes. Data may be incomplete and/or require additional manual work to make it useable. | Subject to GDPR, data on protected characteristics is available to all departments for agreed purposes. | Subject to GDPR, all departments have easy but secure access to data and are expected to use it to achieve SMART+ KPIs in line with institutional strategy and commitments. |

To read the full Living Black at University report
and access other resources, please visit the
**Unite Students Commission on
Living Black at University website**

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