Board Meeting

Date of Meeting	Monday 28 January 2019
Paper Title	Advance HE Equality Report
Agenda Item	19
Paper Number	BM2-X
Responsible Officer	Robin Ashton, GCRB Executive Director
Status	Disclosable
Action	For information

1.   Report Purpose

1.1. To provide for information an Advance HE report which summarises Scottish colleges' performance in relation to the Scottish specific equality duties.

2.   Recommendations

2.1   The Board is invited to **note** the attached report.

3.   Advance HE Reporting on Equality Report

3.1   The attached report produced by Advance HE summarises Scottish colleges' performance in relation to the Scottish specific equality duties.

The report assesses the following duties:

- Duty to report progress on mainstreaming the equality duty
- Use of member information
- Duty to publish equality outcomes
- Description of report preparation
- How will progress be measured?
- Duty to publish a report on progress of equality outcomes
- Duty to gather and use employee information
- Duty to publish gender pay gap information
- What is the gender pay gap?
- Duty to publish statements on equal pay
- Duty to publish in a manner that is accessible

3.2   The report highlights areas where it has assessed that it has worked well and is based on aggregated analysis of performance across colleges and HEIs. The report references positive examples of practice at Glasgow Clyde College and City of Glasgow College. In addition, the report provides recommendations to improve effectiveness across the sector.

4.   Risk Analysis

4.1   No risks are identified.

5.   Equalities Implications

5.1   The positive examples and recommendations highlighted within the report provide helpful suggestions which could support GCRB to improve its practice in relation to equalities

5.   Legal Implications

5.1   The Equality Act 2010 requires all 'public authorities' to fulfil the requirements set out by the Act in the Public Sector Equality Duty (PSED). Colleges in Scotland are listed as 'public authorities' in schedule 19 of the Act.

6.   Financial Implications

6.1   No financial implications are identified.

7.   Strategic Implications

7.1   The aims of the equality act align closely to regional strategic ambitions to widen access and support inclusive economic growth.

Reporting on equality:

Assessment of colleges' performance of the Scottish specific equality duties requirements in 2017

Contents

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Introduction

This report summarises Scottish colleges' performance of the Scottish specific equality duties reporting requirements for April 2015. It focuses on whether colleges met the publication requirements and demonstrated progress towards meeting the duties since the last round of reporting. It shares areas for improvement and effective approaches to reporting.

The report contains our opinions on how well colleges have met the specific duties. It includes our views on what works, with examples from both colleges and higher education institutions (HEIs) that reflect this, and recommendations for improvement.

What were the 2015 reporting requirements?

Equality Act 2010: Public Sector Equality Duties

Equality is underpinned by legislation. The Equality Act 2010 requires all 'public authorities' to fulfil the requirements set out by the Act in the Public Sector Equality Duty (PSED). Colleges in Scotland are listed as 'public authorities' in schedule 19 of the Act.

The Act covers nine 'protected characteristics':

+ age

+ disability

+ gender reassignment

+ marriage and civil partnership (in employment)

+ pregnancy and maternity

+ race (includes nationality)

+ religion and belief (includes no religion or belief)

+ sex

+ sexual orientation

The PSED is made up of general and specific duties.

The general duty consists of three main requirements. These are underpinned by specific duties (set out in the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 that accompanies the Act). The specific duties are intended to assist public bodies to meet the general duty.

General duties

The general duty requires colleges, in the exercise of their functions, to have 'due regard' to the need to:

+ eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010

+ advance equality of opportunity between people from different groups considering the need to:
  − remove or minimise disadvantages suffered by people due to their protected characteristics
  − meet the needs of people with protected characteristics
  − encourage people with protected characteristics to participate in public life or in other activities where their participation is low

+ foster good relations between people from different protected characteristic groups, tackling prejudice and promoting understanding between people from different groups

Specific duties

The specific duties aim to help colleges to better meet the general duty. Both the general duty and the specific duties must be met.

To meet the specific duties, colleges were required to:

+ report on progress on mainstreaming the general duty into all functions every two years

+ publish and deliver a set of equality outcomes that cover all protected characteristics every four years

+ assess the impact of new and revised policies and practices against the needs of the general duty on an ongoing basis

+ gather and publish information on the protected characteristics of employees to inform progress and action towards the mainstreaming duty every two years

+ publish the gender composition of the governing body and the steps taken towards diversity among the governing body members as part of the mainstreaming duty every two years

+ publish gender pay gap information every two years

+ publish statements on equal pay for gender, race and disability every four years

+ have due regard to the general duty in procurement

+ publish the above information in a manner that is accessible

Colleges last reported on the specific duties in 2017.

Research approach

Following on from the most recent publication date in April 2017, every report produced by colleges under the specific duties regulations has been analysed.

We considered how well colleges reported on the duties to:

+ report on progress on mainstreaming the general duty into all functions every two years

+ publish and deliver a set of equality outcomes that cover all protected characteristics every four years

+ gather and publish information on the protected characteristics of employees to inform progress and action towards the mainstreaming duty every two years

+ publish the gender composition of the governing body and the steps taken towards diversity among the governing body members as part of the mainstreaming duty every two years

+ publish gender pay gap information every two years

+ publish statements on equal pay for gender, race and disability every four years

+ publish the above information in a manner that is accessible

Note: The Equality and Human Rights Commission (EHRC) is the legal regulator. The Scottish Funding Council provides funding to support Scottish institutions to improve their equality work through guidance, advice and enhancement projects.

The EHRC in Scotland undertook a monitoring exercise of all listed public sector bodies' performance of the duties in 2017 and published *Measuring up? 7: public authorities' performance in meeting the Scotland Specific Equality Duties 2017* ([www.equalityhumanrights.com/en/](https://www.equalityhumanrights.com/en/publication-download/public-authorities%E2%80%99-performance-meeting-scottish-specific-equality-duties-2017)[publication-download/public-authorities%E2%80%99-](https://www.equalityhumanrights.com/en/publication-download/public-authorities%E2%80%99-performance-meeting-scottish-specific-equality-duties-2017)[performance-meeting-scottish-specific-equality-](https://www.equalityhumanrights.com/en/publication-download/public-authorities%E2%80%99-performance-meeting-scottish-specific-equality-duties-2017)[duties-2017](https://www.equalityhumanrights.com/en/publication-download/public-authorities%E2%80%99-performance-meeting-scottish-specific-equality-duties-2017)). The report contains an aggregated analysis of performance across colleges and HEIs. It suggests that the college/higher education sectors as a whole performed relatively well in comparison to other public sectors in Scotland.

This report does not replicate *Measuring up? 7*. Rather, it considers how well colleges report on, and evidence progress on, and impact of, the work carried out to achieve the changes expected within the duties. It is not a comment on any college's overall equality and diversity work.

Duty to report progress on mainstreaming the equality duty

Many mainstreaming reports were lengthy, particularly those containing reporting on other duties and there were many different ways of identifying and explaining the approaches to mainstreaming. In the combined reports it was difficult to assess evidence of mainstreaming where it was not explicitly reported on.

Overall, the focus of many reports was on qualitative data. The reports made heavy use of narrative and case studies to evidence progress towards mainstreaming with the majority of case studies revolving around activities developed or undertaken that supported equality. There was little use of quantitative data to show a rationale for the activity or to show progress.

While reports gave many examples of activities or changes that had taken place, such as a review of the recruitment process, there was a lack of analysis of how this activity progressed mainstreaming of equality within the college's functions.

Where it worked well

There were some creative approaches to describing mainstreaming, with the use of case studies, infographics, story boards, good news stories, campaign successes and life stories. In some cases, this was under-pinned by qualitative data that demonstrated a need for the activity or action and allowed the institution to measure progress and identify impact.

North East Scotland College's report includes a range of statistics and graphs and comparisons with benchmarks from previous years. It also uses qualitative data such as quotes from staff and student surveys and case studies to demonstrate impact. For example, it demonstrates a range of activities aimed at staff (such as enhanced parental leave, disability confident, staff disability initiative) that had a positive impact. As a consequence of targeted actions, the number of staff indicating that they have a disability increased from 4.7% to 7.5%.

Some reports described how equality and diversity are considered in functions, policies and strategies. This better addresses the requirement to report on progress towards mainstreaming across functions. Where it worked well, the mainstreaming report was narratively linked to other strategic documents, ie Outcome Agreements and strategic planning documents, with outcomes and measurements across documents.

At **Glasgow Clyde College** every department completes a self-evaluation template providing a narrative of work undertaken to embed equality within its work. Every department is also required to complete a matrix explaining how the work is linked to college equality-related strategies and the three general duties.

Glasgow School of Art's mainstreaming report provides a good example of understanding and demonstrating the impact of equality mainstreaming. It structures its mainstreaming approach around equality impact assessment. The report is broken down by function, including case studies, and it provides a qualitative assessment of progress and impact.

Recommendations

+ There is a need for benchmarking that should include both qualitative and quantitative data in order to show impact since the last report.

+ Report on progress over the previous two years (in this case 2015–17). Current reports should build on previous reports to show progress in each reporting round in comparison to previous qualitative and quantitative data.

+ Focus on the work and activities that contribute towards mainstreaming equality across college functions.

+ Narratively connect the mainstreaming report and activities to other strategic documents and high-level operational and action plans.

+ Focus on identifying the impact of activities and actions for groups that are underrepresented or experiencing disadvantage and provide evidence of the impact this has had, or evidence of it having taken place (eg dates, participants/reach, some examples of results of a change made).

Use of member information

A majority of colleges provided data on the gender composition of their boards, while a small number published data on more protected characteristics, although this mainly consisted of 'prefer not to say' responses. Less than half of all colleges provided a narrative on current diversity with fewer describing actions planned to improve board diversity.

Most colleges have signed up to the voluntary '50/50 by 2020' pledge.

Where it worked well

Good examples discussed current board diversity in light of the local context and went on to provide a plan as to how diversity would be improved.

Borders College regional board's assessment of the previous board's appointments led it to advertise, inviting applicants from all sectors of the community and from people with skills which would enhance its work. The board nominations committee has responsibility for ensuring a wider diversity amongst board membership. Board members agreed that the protected characteristics the board would most benefit from were race and disability along with lesbian, gay, bisexual, transgender+ (LGBT+). It raised the possibility of co-option of people with protected characteristics to the board and tasked senior managers with identifying local groups within the community with whom they can open up discussion to support this objective.

Edinburgh College board, in line with the Code of Good Governance for Scotland's Colleges guidance on board development and evaluation, has approved a development plan for 2017/18. Key objectives within the plan, as agreed by board members, are to 'enhance succession planning to continue to improve balance and representativeness of the board' and 'achieve/maintain a gender balance'.

West College Scotland has clearly identified actions to improve board diversity that includes:

+ asking existing members to update their equality data to better understand their profile in terms of diversity

+ communicating the intention of the board to increase its diversity to all stakeholders

+ taking positive action in recruitment of board members to encourage underrepresented groups to apply, for example through targeted advertising and search firms

+ using existing networks to advertise opportunities, for example LinkedIn, including specifically encouraging known individuals of an underrepresented group to apply

+ raising awareness of the role of board members and the benefits participation offers to the individual and the community

West Highland College had an equality outcome in 2013 on improving the gender balance of the board. It identified the actions it intended to take to address this, and provided a narrative explaining how it took these forward and the lessons learnt in doing so. There are future considerations for post-2017, recognising that further work is needed.

Recommendations

+ Consider gathering equality data across protected characteristics. While only gender is currently required, it will begin to familiarise board members with a broader process and may provide useful evidence.

+ Include context showing how the information has been used and how it is proposed to use the information to increase board diversity.

+ Develop a succession plan with SMART actions.

Duty to publish equality outcomes

The number of equality outcomes ranged between four and 14 and covered a mix of students, staff, and staff and students.

Many equality outcomes were by default across all protected characteristics, ie stating that all staff and students will benefit from an inclusive environment. Where protected characteristics are explicitly mentioned, there was a focus on gender and disability, followed by race. Age, marriage and civil partnership status, and gender reassignment were least likely to be explicitly covered, followed by religion or belief. Outcomes often did not meet SMART criteria, more resembling aims, but were often accompanied by actions that did meet the criteria.

Where it is discussed, the lack of equality outcomes on specific protected characteristics is connected to lack of data on that protected characteristic.

Where it worked well

There are two aspects to this: the equality outcome itself and how it is portrayed in the report.

Clear outcomes were protected characteristic specific and focused on a specific need, ie increasing underrepresentation (in comparison to many outcomes which stated, for example, a welcoming and inclusive environment for all). Outcomes also showed an evidence base and rationale for their inclusion. The best examples utilised SMART criteria.

Edinburgh College clearly identifies equality outcomes based on consultation with students, staff and external partners through focus groups, events and conversations, considers national policy initiatives, aligns these outcomes with work already being planned/carried out in the college, and uses evidence, research and external information. Outcomes are protected characteristic specific and SMART, based on local evidence, with connections to the PSED and national policy. All protected characteristics are addressed, either in an equality outcome or with an explanation as to why they are not addressed.

A clear layout helped to demonstrate the rationale and context for the outcome. Many reports included tables that showed, for example, internal qualitative and quantitative data used to identify a need, a connection to the college's strategy and national policy agenda, and how the outcome meets the general equality duties.

University of Stirling provides a rationale section for each individual outcome which includes evidence used in developing each one and the process used. It references progress made against original outcomes, consideration of sector-wide development changes, and analysis and guidance issues by external organisations. Each outcome is shown to align with the university's strategic plan.

Description of report preparation

In many reports there was evidence of use of a wide range of methods. Many used focus groups and consultation with external stakeholders, for example, and the use of internal committees and staff groups was common. In terms of using data already available through existing information gathering processes, many colleges also used evidence from existing staff and student feedback surveys. Despite this, there was little reference to baseline data in developing the outcome or narrative around benchmarking. The focus was more on consultation on the new equality outcomes rather than evidencing the rationale for them. An extension of this was the lack of detail around setting priorities for outcomes, ie why and how the new outcomes were chosen over possibly other competing priorities.

Few reports discussed a connection to previous outcomes and how the new ones built on these, in particular which ones needed to be continued/adapted or dropped and the rationale for this.

Where it worked well

Good examples used a wide and creative range of techniques for both gathering data and consultation, such as utilising existing surveys and feedback mechanisms, consulting widely across staff and student groups, and creating focus groups and protected characteristic groups to discuss new equality outcomes. Some also made explicit connections to college strategy and national policy drivers as well as local context.

City of Glasgow College utilised a broad range of processes to develop and consult on new equality outcomes beginning with an initial mapping across college, Scottish Funding Council and Glasgow Regional Board priorities to identify a strategic and operational direction. It then used both internal and external feedback to develop these into its equality outcomes. There was consultation with college groups, an online survey and cross-college focus groups with a range of staff and students as well as protected characteristic specific groups. The report also references its sources of evidence as a rationale for the outcomes. The report contains an appendix which provides a context for each equality outcome, discussing external and internal drivers for it, with actions and outputs, and which of the college's strategic aims, PSED and protected characteristics the outcomes will support.

Glasgow Caledonian University provides an extensive description of equality outcome development. The outcomes were developed with a range of stakeholders, finalised with the input of leaders from across the university, and endorsed and approved by key fora. The setting of equality outcomes was based around a three-stage process of gathering evidence, identifying priority issues and gaining approval.

How will progress be measured?

Several reports included clear measurement frameworks, containing actions, outputs and timescales. There was often good use of action planning, targets, outputs and activities built in that could be measured over time. However, there was a consistent lack of baseline measurement to assess progress, even in some of the best examples, which will make use of the measurement frameworks difficult over time.

Where it worked well

The best examples used current data as a baseline, which allows for measurement of progress. Some included a progress plan with publication dates which should support accountability and transparency of the process. Finally, some included action plans with clear lists of measurements and impacts, and with identified responsibilities.

Glasgow Clyde College uses a comprehensive range of baseline data at local, sectoral and national level for comparison. The report includes a regional aligned equality outcome framework and progress plan reporting structure. The progress plan, which will be presented and published separately, details:

+ regional strategic equality outcome themes, which are long term and aspirational in nature

+ specific equality outcomes, the changes or results which support meeting each of these strategic outcomes; these are more short- and mid-term and operational in nature: hard outcomes can be quantified and measured numerically; soft outcomes, whilst not counted, are still measurable

+ context and narrative, detailing the contextual basis for the outcome with reference to evidence sources

+ impact measurement to demonstrate progress, detailing the impact mechanisms and measures to demonstrate progress, together with specific targets

+ action to target staff or students, in support of achieving a specific outcome

+ intended outputs, the effect of actions which will support achieving specific outcomes

+ responsibility, the staff role or college functions tasked with implementing the action

+ timescale, detailing the month and year, by which point the action, and resulting output, will be met

Perth College, for each equality outcome, demonstrates evidence of need based on legislation, national policy, and national and local evidence, including how internal data and evidence informed the outcome, planned outputs and activities required to support the delivery of the outcome.

Recommendations

+ Keep numbers of equality outcomes small in order to be achievable in the four-year period. Focus on the protected characteristics that the evidence shows need targeted work, prioritise as necessary, but always explain the process behind this decision.

+ Remember that outcomes are institutional wide and, as such, there is a balance to be struck between outcomes that are so broad as to be more like organisational aims and those that are too small in scope and resemble operational objectives.

+ Reflect on previous outcomes to show how current outcomes came about.

+ Incorporate the data and evidence used to develop the chosen equality outcomes and to explain how these were prioritised.

+ Consult widely across different stakeholders, such as staff, students and local organisations. Bring in the views of people representing the different protected characteristics. Explain the consultation and development process.

Duty to publish a report on progress of equality outcomes

Overall, the reports showed a lot of activity and actions being undertaken to achieve the 2013 equality outcomes, and evidence was provided to show progress of the activities. The focus of many of the reports was on this, with less discussion of the impact that the activities have had on achieving the outcome. Reports often did not reflect on progress in relation to 2015 or measure achievement using baseline data from the 2013–15 reports.

Where it worked well

Overall, there was good use of a range of creative approaches to providing evidence to show progress, including narrative, data, tables, graphs, case studies and survey results. Some reports assessed each outcome individually, assessing whether it had been achieved fully or partially, and if partially, what was still required. This assessment was supported by evidence from a range of sources and narrative analysing the evidence and progress made. Comparison with baseline data and indicators from 2013 and 2015 enabled a better exploration of whether the outcome had achieved its intended results. This then provided a connection to the new outcomes.

Perth College provides a detailed analysis of each outcome, comparing what was achieved with what it intended to do. The narrative refers to evidencing impact, with each equality outcome action evidenced with staff and student comments, surveys and other forms of evidence to demonstrate progress with actions and outstanding activity required. It includes what needs to be taken forward as part of the new outcomes.

Forth Valley College provides a detailed mind map with forms of consultation and evidence gathering broken down into what was learnt from the outcome, whether it was achieved and examples of progress, impact and challenges. This then leads to what could go into future equality outcome action planning.

Borders College provides a narrative comparison between what it said it would do in 2013 and where it is in 2017. It recognises that further work is still needed and identifies what still needs to be done. There is discussion of the impact of the equality outcome alongside the range of activities completed, for example it was able to show that activities undertaken to progress 'learners are prepared for life, work and to be responsible citizens' had improved student engagement.

Recommendations

+ Analysis of progress should include reflective narrative and data to evidence progress. Each outcome will have initially been identified using analysis of qualitative and/or quantitative data. Assess progress in each outcome against this baseline data.

+ Focus on progress towards the outcome and the impact it has had on the issue it was designed to address, rather than progress on the activities used to achieve it.

+ Explain if each outcome has been partially or fully achieved with an explanation as to how this assessment was arrived at, for example discuss successes/challenges, things carried forward, how the approach has developed. This can then be used as an assessment of how your previous outcomes have informed your next outcomes.

+ Connect progress to other strategic documents.

+ Separate reporting on your outcomes from reporting on mainstreaming. These are separate duties, and while both can be contained in the same report, they should be distinct from each other.

Duty to gather and use employee information

The EHRC assessed colleges' data collection and reporting in *Measuring Up? 7.*

Since the last round of reporting, the publication of staff data has improved considerably, with the majority of colleges publishing 'snapshot' staff data for most of the protected characteristics. However, there were still some significant gaps in data publication, with quite a few reports either not providing data across all protected characteristics, or for the three areas required by the duty (recruitment, development and retention). On average in college reports, data publication decreases from recruitment to development to retention. Where data was missing, it was most commonly for pregnancy/maternity, marriage/civil partnership and gender re-assignment.

There was limited use of previous reporting data to show improvements in staff diversity.

Very few colleges provided information on how the data was being used or how data collection and use would be improved.

Recommendations

+ Provide a 'snapshot' of staff data, and for recruitment, development and retention. For each of these, data should be for all protected characteristics.

+ Keep the data simple, there is no need to provide complicated breakdowns of the data unless this is to evidence another duty.

+ Provide a narrative and analysis of quantitative data.

+ Compare current with previous data to show progress towards improving staff diversity.

+ Include an explanation of what progress has been made, and the changes made, that will improve the gathering and use of data.

Duty to publish gender pay gap information

It is worth highlighting that the college sector is working towards implementing significant national policies that will influence pay and many colleges referenced these in their equal pay reporting. Pay bargaining in particular was mentioned but there remain some issues of more local difficulties in aligning systems and structures post-merger, and issues around pay conservation and re-structuring.

What is the gender pay gap?

It is difficult to fully assess a national gender pay gap due to inconsistencies in reporting, in particular:

+ the majority recorded it primarily as a mean or mean and median; a couple only recorded median; in a significant number of reports, it is either not specified or not clear what the figure refers to

+ most reports included a range of data across staff types and levels but not all reports included a headline single figure as required

+ it was not always clear what calculation was done to achieve the figure stated which means 'like for like' comparisons cannot be made

+ it was not always clear which staff the figure refers to, again not allowing for a 'like for like' comparison

Where mean data is explicitly available, the pay gap ranges from 1.4% to 16.6%, but in light of the inconsistencies these figures cannot be used to provide a robust national average figure.

Where it worked well

Thorough analysis of the pay gap included an assessment across a broad range of criteria. Some included, for instance: all employees by grade rather than job role; an assessment by pay and grade bandings; an assessment by pay gap by band and full-time equivalent; an analysis by department and subject area.

In some reports, there were detailed listings of pay scales, bands and salaries followed by an analysis of the numbers.

City of Glasgow College's 2017 equal pay statement and information analyses both horizontal and vertical segregation by considering the pay gap at each pay grade and within staff groups, by grade. There are tables that show the pay gap by contractual type, length of service and number of college contracts. All tables are followed by a narrative of the data and an analysis unpicking the information to identify the key issues shown. The report addresses the impact of occupational segregation on the pay gap. It includes an analysis of the gender pay gap by age, disability and race, recognising that low numbers of disabled and black and minority ethnic (BME) staff makes publication of the pay gaps for these staff in isolation difficult.

Moray College's equal pay statement provides an overall pay gap by gender, disability status and race, then considers these protected characteristics by grade to identify any gaps between staff doing work rated as equivalent. Each of the protected characteristics is compared in turn with the overall pay gap, and a detailed analysis by grade is provided.

Queen Margaret University clearly lays out an Equal Pay Review (All Employees)', which provides the gender pay gap information for all employees followed by a detailed breakdown by grade (individually and grouped) and full-time/part-time employment by academic and support staff. There is a thorough analysis of this data and also an analysis by ethnicity, disability, age, sexual orientation and appointed salary.

Recommendations

+ Report on the methodology used to calculate gaps and whether this has changed since previous reporting rounds.

+ Provide a single figure for a college-wide gender pay gap. Include both mean and median figures and identify which is which.

+ Include all staff, including senior staff, staff on zero-hours contracts and visiting staff.

+ There is a need to consider how the college is progressing in reducing the gender pay gap and reports therefore should compare data and pay gaps with those previously reported in 2015.

+ Provide narrative analysis where gaps are identified and aim to address the factors that are contributing to these.

Duty to publish statements on equal pay

The specific duties regulations require a statement on equal pay that discusses equal pay policies and occupational segregation, either through two separate statements or one statement that references both. For many reports it was not clear that there was a distinction between the two aspects and the focus seemed to be on equal pay policies.

This section often consisted of an equal pay policy alone, rather than a statement on equal pay and the equal pay policy. In the majority of reports where there was a statement on equal pay it focused on what the college aspires to in terms of equal pay rather than providing an analysis of the current position in relation to equal pay and how it intends to address the issues.

Where occupational segregation was addressed in the equal pay statement is was more likely to be supported by narrative than supporting data. The majority of colleges are required to provide a statement that covers gender, disability and race (see guidance note for details: www.ecu.ac.uk/publications/the-public-sector-equality-duty-specific-duties-for-scotland-revised). However, not all colleges that had a legal requirement to publish across all three protected characteristics did this. Where a rationale for this was provided it was largely because the use of data meant that numbers on disability and race were so low it was felt they could not be included.

The inclusion of analysis of both horizontal and vertical segregation was mixed. Colleges that provided an analysis across disability, gender and race were also more likely to analyse and provide a narrative on both horizontal and vertical segregation.

Where it worked well

Good examples of reporting provided figures for a wide range of different staff including both full-time and part-time staff, broken down by job role and by grade/level. Some also did this by subject area. This clearly showed the areas with the greatest and least pay gaps and allowed for further discussion on occupational segregation.

The use of tables and graphs was common, but colleges that also provided a detailed narrative explaining the numbers demonstrated a better understanding of the figures. Some reports also provided an analysis of the data comparing it with 2015 data.

Several reports provided action plans with targets explaining what the college intended to do to address the gaps identified in the data and analysis.

> **City of Glasgow College**'s Equal Pay Statement and Information 2017 identifies key issues arising from the gender pay gap analysis and discusses the college's key commitments to addressing these, with an explanation of how each level of the college will take responsibility for these issues. The appendix comprises a detailed action plan.

Perth College's equal pay statement contains separate sections on:

+ equal pay policy

+ gender pay gap report including occupational segregation

+ disability pay gap report including occupational segregation

+ race pay gap report including occupational segregation

+ equal pay action plan 2015–2017 update

+ equal pay action plan 2017–2019

It includes a narrative about initiatives and policies that have been implemented to support action, for example, positive rate of approval of flexible working requests and development support to assist female staff to progress to higher grades.

Queen Margaret University provides detailed information including narrative, charts and tables providing an overview and reflection on occupational segregation, horizontally and vertically, by disability, gender and race. There is a commentary on possible causes and consequences of occupational segregation. The report does contain a caveat that some data may not be reliable due to disclosure issues but references the action plan which includes steps to address this.

Recommendations

+ Include, or link to, your equal pay policy and mention gender specifically. For colleges required to include disability and race, these should also be explicitly mentioned.

+ Provide data and analysis on occupational segregation (vertical and horizontal) on gender, disability and race. Where possible, compare this with data provided in the previous equal pay statement.

+ Where race and disability disclosure is deemed too low to publish the data explain the steps being taken to examine and address the issue.

+ Outline planned actions to address pay gaps and occupational segregation.

Duty to publish in a manner that is accessible

Colleges published reports in different formats, with a mix of separate reports for each reporting duty, with others combining reports in a variety of ways. Where reports were combined, generally it was within the mainstreaming report and the majority of these have clearly defined sections on each reporting duty.

There is a requirement for reports to be published in a manner that makes the information accessible to the public. This was tested by attempting to find reports through the following means:

+ was the report available from the home page?

+ if not, was it available in the equality section of the website?

+ if not, could it be found through a search within the college website?

+ was it accessible from a Google search?

The majority of reports sit within the equality sections of college websites and were therefore easy to find. The remaining reports were found in the corporate documents/ publications/freedom of information sections of college websites and were less easy to find.

The majority of reports, but not all, were clearly titled and dated. Those that were not clearly titled and dated were more commonly the combined report. Dates were often the date of publication alone, rather than the period covered by the report.

Where it worked well

West College Scotland has one main equality report with clear sections for all of the duties and a detailed index for each duty.

Recommendations

+ Consider where reports are published and how people might look for equality reports if they are not familiar with college structures or information storage.

+ Clearly title and date reports. Where reports are combined, it should be clear which duties the report covers.

+ Along with the date of publication, include the period the report covers.

+ Due to the length of some reports, particularly combined reports, consider including summaries or bullets points at the beginning of sections.

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