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**Full Equality Impact Assessment
of Admissions Policy at the
University of Northampton**

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1 EXECUTIVE SUMMARY AND RECOMMENDATIONS

1.1 **Summary** Equality impact assessments comprise thorough and systematic reviews of an institution's policies, practices and procedures to determine whether they have a differential and adverse impact on a particular group.

1.2 The University has a legal duty to conduct equality impact assessments on new and existing policies, practices and procedures under the Race Relations (Amendment) Act (2000); the Disability Discrimination Act (2005) and the Equality Act (2006). There is in addition an obligation to publish the results of the impact assessments once they have been conducted.

1.3 Given that there are legal responsibilities on all public bodies, including HEIs, to undertake equality impact assessments (EIAs), the University of Northampton decided to take on board the HEFCE guidance on conducting EIAs. This recommended a two stage process for the EIA process:

- I. Initial screening of all policies and procedures;
- II. Full equality impact assessment of those policies and procedures where the initial screening indicated that there was prima facie evidence that they had a differential and adverse impact on a particular group.

1.4 Initial screenings of the admissions process in 2003-04 and 2004-05 pointed to 'clearly disproportionate and adverse "offer" rates applying (in particular) in respect of applicants of Black-African ethnicity' which was 'consistent over two years' and 'need[ed] further detailed explanation/investigation'. There were in particular 'notable differences in offer rates for Black-African applicants to selecting courses (or groups of courses) in the Schools of Health and Education'.

In the light of this, the initial screenings recommended a full equality impact of assessment 'of all selecting courses'.

1.5 The Centre for Children and Youth subsequently put in a tender for widening participation project funding in January 2008 to undertake the full equality impact assessment. This was successful and this report represents the published outcome of its investigation into the university's admissions process in the 2 Schools where there was strongest evidence of adverse impact.

1.6 An examination of 45 other universities' approach to EIAs indicated that the University of Northampton's approach to equality impact assessment was comparatively advanced. A considerable number of initial screenings of policies have already been undertaken and they have drawn on systematic data and in some cases led to action. Only a few universities have gone further in conducting full equality impact assessments of admissions. In all these cases, a quantitative approach was predominant. What is noticeable, however, was the dearth of qualitative analysis that uncovered perceptions of the admissions process. Two of the reports drew upon focus groups with students and one drew upon discussions with pertinent staff. We decided methodologically to follow the best practice and supplement quantitative data by interviews with BME students and admissions tutors. In addition, we chose to look at available student application forms and analyse the reasons given for rejecting candidates.

1.7 BME students as a whole have a high participation rate in HE. They are, however, less likely to be found in old universities and indeed face an ethnic penalty when applying to such universities. Across the sector as a whole, BME students are more likely to leave earlier and less likely to gain good honours degrees than White students.

1.8 The University of Northampton's admissions policy exemplifies a commitment to the principles of fair access and widening participation.

How the values enunciated in the University's admissions policy are met is delegated to Schools.

1.9 Of the two Schools examined in this report, the School of Education has developed its own individual policy, which it expects course teams to implement, while the School of Health leaves it up to each course team to devise its own policy. The School of Education policy is, in our view, exemplary and successfully seeks to incorporate in its procedures good practice.

1.10 Application forms were looked at for the academic year 2007/8, for selecting courses, mainly in the Schools of Health and Education. This entailed examining individual applications forms where students were not made an offer for the selecting course and the reasons for rejection that were recorded. It was noted whether the applicant was white or from an ethnic minority background. Since there was no box for ethnicity on the form, this information was inferred from the applicant's nationality and their name.

1.11 This analysis identified similar reasons for rejecting both white and non-white candidates. The most common reason given for both was 'better candidate'.

1.12 There was a slight tendency for non-white candidates to be rejected because of their '*personal statement*'.

1.13 The analysis did reveal some seeming oddities: In two of the courses, the reasons given for rejecting 2 Black African candidates were peculiar. In one case, the applicant was declined on the grounds of '*better candidate, no evidence of recent study*' when the application form demonstrated in their qualifications relevant recent study; and in the other case, the applicant was declined on the grounds of '*better candidate*' and yet the applicant had a 2.1 honours degree. It may have been appropriate to reject these applicants, but the reasons stated do not clarify why they were.

1.14 In some cases, the reasons given for rejection did not identify the criteria being employed. '*Better candidate*', the most common reason given, is a case in point.

1.15 There were scoring systems in place for 2 courses, but these were not completely transparent, at least to us. In the case of one of these, 15 out of a potential 455 applicants were accepted with the 15 applicants' scores ranging from 40 to 46 out of a possible 50. One Black African candidate was rejected, however, with a score 43 because of a '*weak personal statement*'.

1.16 Interviews with 10 Admission tutors indicated that typically there were two stages to the selection process: an application stage and an interview stage.

1.17 In the application stage, tutors are looking for a range of things including a good academic record, a personal statement that demonstrates commitment to the course, appropriate and relevant experience, and a positive reference.

1.18 A range of methods are typically used on selection days. These include

literacy and numeracy tests, presentations, group discussions and individual interviews.

1.19 In some cases, resource constraints prevent course teams from conducting individual and group interviews, and in other cases, tutors may feel completely isolated in selecting who is admitted to a particular course.

1.20 We discovered many examples of good practice: Admissions tutors often give applicants 'second chances'; potential applicants are often given helpful information about the course requirements well in advance of the application process; and in some cases, tutors have modified their practice in the light of consultation.

1.21 Tutors were adamant that the admissions process was fair. The range of people, including experienced practitioners, on selection days was generally seen as helpful in this regard. The use of mark sheets

and the need to adhere to professional regulations were also seen by some tutors as helpful in facilitating fairness.

1.21 The tutors emphasised that they took no account of ethnic differences in their selection of students, but instead made their decisions in the light of stated criteria; and indeed some tutors were sceptical that their particular course actually did have a lower offer rate.

1.21 Some admissions tutors explained that, if they were rejecting Black African students, it was not something that they were aware they were doing.

1.22 Few tutors considered there to be significant differences in performance on selection days between applicants from different ethnic groups. A few, however, did refer to spoken English, contribution to group discussion and performance in interview, and wondered whether these factors might account for the lower offer rate.

1.23 Tutors did not by any means all subscribe to a deficit model, however, with some pointing to the fact that applicants from some minority ethnic groups were more likely to have pertinent experience and be strongly motivated than White students.

1.24 It was suggested that the dearth of BME students on some courses is related to the fact that few apply, and that, even when offers are made, factors outside the course team's control can prevent offers being taken up.

1.25 It was suggested only by a few tutors that Black African candidates may face inadvertent and indirect discrimination. Such inadvertent discrimination may stem from the reluctance of tutors to recognise the different life experiences of applicants. One tutor argued that, when looking at students' performance in the admission process, it is important to consider the expectations of the admissions tutor.

1.26 There was a notable reluctance to attribute the lower offer rate to racism.

1.27 Measures to enhance practice included more careful articulation of the reasons for rejecting students; the use of more people in the selection process;

further pre-course advice for potential applicants.

1.28 While some tutors welcomed outreach work, others had reservations about targeting black African groups.

1.29 There was reluctance from tutors to change the admission criteria to facilitate a higher offer rate for BME students. Indeed tutors unanimously believed that this was not a good reason for changing the criteria and that doing so would lower academic standards.

1.30 We conducted 10 student interviews, 9 with BME students. The responses were much more variable than those of admissions tutors.

1.31 Two students on a course in the School of Education believed that the admissions process was fair and reported that they had not experienced any discrimination.

1.32 By contrast, the interviews with seven BME students on 2 courses in the School of Health prompted highly critical judgements of the admissions process. 5 of them felt that it exemplified clear indications of racial discrimination.

1.33 There was a widespread sense that BME students in particular faced significant barriers. These barriers partly related to the students' perceptions of admissions tutors.

1.34. While we must remember that these are perceptions from a small number of students who cannot be assumed to be representative of BME students in the School, they cannot be dismissed. They are very real for the participants whose actions are likely to be informed by their definition of what is going on. What the remarkably critical comments of some of the students indicate is that it is crucial for there to be better communication with and consultation with BME students. The perceptions of these BME students in the School of Health interviewed may or may not be accurate, but they clearly are not

congruent with the perceptions of admissions tutors. It is crucial in this context that mechanisms are created that facilitate effective dialogue.

1.35 The data that we have analysed does not allow us to reach a definitive conclusion as to why Black Africans receive a lower offer rate on selecting courses. We certainly cannot conclude that admissions tutors act in a racially discriminatory fashion. While we come across three cases where students were turned down with good academic qualifications, admissions tutors make their judgements in relation to a range of criteria of which academic qualifications comprise only one. We cannot conclude therefore that even these three exceptional cases point to discriminatory treatment.

1.36 It is conceivable that the lower offer rate stems, as some admissions tutors argue, from the poorer overall performance of Black African candidates on selection days in spoken English, contribution to group discussion and performance in interview. While admissions tutors acknowledge the need for such performance judgements to be made on the basis of explicit criteria, it was noticeable that the most popular reason given for rejecting candidates was 'better candidate', a reason that makes no reference to criteria. When explicit criteria do not form the basis of judgements, the danger of unconscious assumptions playing a role becomes greater.

1.37 Although we are not able on the basis of the data collected to reach a definitive judgement as why Black Africans receive a lower offer rate on selecting courses, we were able to identify some good practice, much of it apparent in the university admissions admissions statement and School of Education admissions policy. Many of our recommendations entail the wider dissemination of this good practice. We were also able to find some discordance between the perceptions of admissions tutors and some (but not all) BME students. This finding also informs some of our recommendations.

1.38 Recommendations

1. To continue monitoring each year how the admissions process works across the university. Particular attention should be given to selecting courses, where applications, offers, acceptances and enrolments need systematic monitoring.
2. To continue to include as a key agenda item in validation and periodic review a course's admissions policy. The importance of admissions may need to be reemphasised to Chairs and panels. It is important that policies are written down, that the criteria informing judgements in each of the elements and overall are explicit, and that there are mechanisms which ensure reflection on how the criteria are interpreted and implemented. It is also important there should be explicit discussion as to whether or not the criteria under discussion might have a disproportionate adverse impact on particular ethnic groups.
3. To prioritise in admissions training the importance of having explicit admissions criteria in each of the elements (such as the personal statement and interview) being assessed. It is suggested that cases studies and role play are used to facilitate debate and reflection on how admission criteria can most effectively be articulated and implemented.
4. To remind course teams of the importance of articulating reasons for rejecting candidates in terms of explicit criteria. This is important to ensure that judgements are made in terms of explicit criteria and to enable applicants to receive helpful feedback. It is crucial that, in documentation where 'reasons for acceptance/offer and rejection/no-offer' are recorded, the reasons for rejection are clearly articulated and related directly to the applicant's qualifications, experience etc. Senior admissions tutors should take special care to monitor this process.

5. To include exercises in the training of admissions tutors that address the above issue, notably the recording of reasons for acceptance and rejection, and disseminate good practice. It should be emphasised that a failure to record properly reasons for rejection might be interpreted by the courts (if there was a legal challenge) as evidence of unfavourable treatment and thus unlawful discrimination
6. To pay particular attention to courses where only one person is involved in the admission process. It is important that mechanisms are in place to ensure that this person is supported and that opportunities exist for the admissions process to be discussed.
7. To consider in the School of Health the option of developing a School Admissions Policy.
8. To create mechanisms that enable course teams to liaise effectively with BME students.
9. To support further research into the perceptions of BME students of both the admissions process and their experience of higher education.

2. EQUALITY IMPACT ASSESSMENTS: What are they? What are they supposed to achieve? How are public bodies legally bound to undertake such assessments?

2.1 Definition An Equality impact assessment (EIA) comprises an assessment of the impact of existing or proposed policies, practices and procedures in relation to their consequences for equality.¹ It entails, in short, a thorough and systematic review of an institution's

¹ Conducting Equality Impact Assessments in Higher Education (2007) (Equality Challenge Unit/ Higher Education Funding Council for England) <http://www.ecu.ac.uk/publications/guidancepublications/200709-ConductingEqualityImpactAssessments.pdf>

policies, practices and procedures to determine whether they have a differential and adverse impact on a particular group.

2.2 A differential impact is when a particular social group has or will be affected differently by the policy, practice or procedure in a positive, neutral or negative way. An adverse impact is the point at which the differential impact becomes detrimental to the social group in question. If a policy, practice or procedure is found to have a differential and adverse impact, the onus is on the organisation to consider alternative ways of delivering the policy objective without disadvantaging particular groups.

2.3 **Rationale** A key purpose of equality impact assessments is to ensure that an institution's policies, practices and procedures are neither directly nor indirectly discriminatory. Discrimination takes a direct form when a policy, practice or procedure intentionally disadvantages people from particular groups. Discrimination takes an indirect form when a policy, practice or procedure unintentionally has a negative impact on people from some groups more than others, and the reason for this cannot be justified. It often occurs where a requirement is applied equally to all groups, but has a disproportionate effect on the members of one group because a considerably smaller proportion of members of that group can comply with it.

2.4 The rationale behind the introduction of EIAs is to ensure that discrimination does not occur on the grounds of race, disability, gender, sexual orientation, age, and religion or belief. It aims to seek out hidden or indirect discrimination in the application of a policy and consider ways in which equality can be promoted through policy development and practice. In essence, an EIA can be seen as a means of quality control, or an 'equality MOT'.

2.5 EIAs are designed not only to root out discrimination but also to promote equality. Equality means treating everyone fairly so that each person can participate and has the opportunity to fulfil their

potential. This does not entail treating everyone the same, but making sure that no-one is unfairly disadvantaged when it comes to getting what they need. Such a goal necessitates that the individual requirements of different people and different communities are taken into account.

2.6 In their search to embed equality through impact assessment, institutions face two key challenges: *promoting understanding of impact assessment across the institution and valuing its use as an instrument of positive change.*

2.7 Advocates of EIAs identify a range of ways whereby they can be used to promote positive change:

- Equality impact assessments are a means of judging whether an institution's policies, practices and procedures are operating in the way that they are intended to do.
- They not only allow for a better understanding of how policies are operating but also allow institutions to reflect on practice.
- They provide valuable information that allows institutions to target strategies for the recruitment and retention of staff (and, in the case of universities, students)
- They facilitate the mainstreaming of equality within the institutional setting, which in turn can promote greater efficiency of process with less bureaucracy.
- They can improve an institution's internal and external image; build trust in fair and equitable operation of policies; and improve morale.
- They provide institutions with an opportunity to celebrate positive measures that they are undertaking in relation to equality and diversity.
- They are complementary to existing means of review, such as internal quality assurance processes and other self-evaluation and quality-checking tools.

2.8 Legal obligation The Higher Education Funding Council for England and the Scottish Funding Council and the Higher Education Funding Council for Wales are legally bound to carry out race, disability and gender impact assessments on all relevant policies. Impact assessments are one of the specific duties under equality legislation in the areas of race, disability and gender, and are required in order to meet the general duties to promote race, disability and gender equality²

2.9 The University has a legal duty to conduct impact assessments on new and existing policies, practices and procedures under the Race Relations (Amendment) Act (2000); the Disability Discrimination Act (2005) and the Equality Act (2006). There is in addition an obligation to publish the results of the impact assessments once they have been conducted.

3 THE UNIVERSITY OF NORTHAMPTON'S APPROACH

3.1 EIA as a 2 stage process Given that there are legal responsibilities on all public bodies, including HEIs, to undertake EIAs, the University of Northampton decided to take on board the HEFCE guidance on conducting EIAs. This recommended a two stage process for the EIA process:

- III. Initial screening of all policies and procedures
- IV. If initial screening indicates that there are potentially important issues to consider in more depth (such as the need to explain some disparity or under-representation of equality groups), then consideration will be given to undertaking a more rigorous and in-depth full EIA. This is likely to involve both quantitative and

²**Briefing** October 2007 - Using equality impact assessments for heads of institutions and senior management (Equality Challenge Unit)
http://www.ecu.ac.uk/publications/briefing/200710-Using_equality_impact_assessments.doc

qualitative analysis and full EIAs are like to be resource and time intensive. Given the more substantial nature of a full impact assessment, it was always considered that these would concentrate on significant policies that were like to have a high impact on equality. In addition, it was acknowledged that there would not be too many of them.

3.2 Initial screening process The process of undertaking initial screenings was agreed as follows:

- I. A list all significant and current university policies, procedures, and strategies was produced (this took some time to draw up). This list also tried to identify the lead (named) person who was responsible for the policy concerned and who thus had responsibility for leading on the EIA screening
- II. A schedule of EIA screenings of these policies etc, was drawn up and agreed over a three year period (2006-2009).
- III. It was also agreed that any new or emerging policies or procedures would be screened for equality impact at an early stage in drawing up and/or agreeing the new policy.
- IV. The screening process encouraged the production of recommendations that might involve immediate action to change a policy/procedure etc., or action to mitigate the effects of the policy or procedure on equality groups, or subsequent action such as further data collection/analysis). Although it was considered unlikely that most screening would recommend a full EIA, it was considered important that action nevertheless was undertaken, if it needed to be, without reference to a full EIA.
- V. The initial screening process, it was recognised, should, as far as possible, be informed by any qualitative or quantitative data currently available; if it was not available then consideration should be give to the future collection and analysis of such data if it was practical and reasonable to do so and the screening

indicated there may be equality issues that need to be examined in more depth in the future.

- VI. It was agreed that all screenings would be undertaken by whoever was the lead member of staff for that policy, procedure or service area that was being screened. Support would be offered by the Equality & Diversity Advisor in the form of consultancy/advice/guidance.
- VII. The screening, when completed would be presented to both the Equality & Diversity Action Group and any other appropriate committee that was responsible for the policy that had been reviewed. In the case of new policies being developed, the EIA screening would accompany the draft policy to any committees that are considering the policy prior to adoption.
- VIII. At all stages of the screening process it was stressed by the Equality and Diversity Advisor that the process should not be seen simply as a "tick-box" or administrative exercise, but rather as an ***imaginative and professional process*** that seeks to improve the university's services/arrangements/processes to ***all*** staff and student and ***to ensure that anything that might be unfair, or result in inequality, is looked at in great detail and (if possible/proportionate/reasonable) to change it.***
- IX. The process of undertaking EIA was designed to be one which was open, transparent and non-threatening. The EIA process was thus concerned with seeking to make positive changes ***in the future***, by examining the past. If issues were identified, the process was ***not*** about apportioning "blame" for what had happened in the past, but about learning and moving forward in possibly new and exciting ways.

3.3 Professor Peter Bush (Pro-Vice Chancellor - Academic) has summarised the University's approach to the EIA process as follows: *"An impact assessment involves gathering and using evidence to make a judgement about how a particular policy or practice or procedure*

affects, or is likely to affect different groups of people, or when, it is implemented. It is about taking action to ensure that we provide high quality services/facilities/education to all staff, students and visitors on an equitable and lawful basis and to ensure that all staff are aware of their responsibilities for doing this.”

3.4 A considerable number of initial screenings have been undertaken (although mostly on student-focused polices/service areas). Only one full EIA has been recommended so far. This is the subject of this report and concerns some student Admission issues in respect of selecting course. This full EIA was undertaken in 2008 following two initial screenings of the Admissions Policy which were undertaken in 2005 and 2006.

3.5 Initial screenings of Admissions policy Initial screenings of the admissions process in 2003-04 (Appendix 1) and 2004-05 (Appendix 2) pointed to ‘clearly disproportionate and adverse “offer” rates applying (in particular) in respect of applicants of Black-African ethnicity’ which was ‘consistent over two years’ and ‘need[ed] further detailed explanation/investigation’. There were in particular ‘notable differences in offer rates for Black-African applicants to selecting courses (or groups of courses) in the Schools of Health and Education’. In the light of this, the initial screenings recommended a full equality impact of assessment ‘of all selecting courses’. The Centre for Children and Youth subsequently put in a tender for widening participation project funding in January 2008 to undertake the full equality impact assessment. This was successful and this report represents the outcome of its investigation into the university’s admissions process in the 2 Schools where there was strongest evidence of adverse impact.

3.6 A research assistant, Natasha Mansukhani, was appointed to undertake the fieldwork and a steering group chaired by Professor Andrew Pilkington was set up to manage the project. The steering group comprised Andrew Pilkington, Natasha Mansukhani, Paul Crofts (University Equality and Diversity advisor), Paul Tebbutt (University Admissions officer in Registry), Ian Gardner (School of Education Admissions tutor), Sindy Banga (School of Health Admissions tutor) and Melanir Crofts (Law lecturer). The steering group met formally three times on May 14, July 8 and August 27, 2008.

3.7 More information on the University's approach to EIAs and copies of all screenings undertaken to date, can be found at: <http://www2.northampton.ac.uk/portal/page/portal/AEP/oepll-home/equality-diversity/eia>

4. STUDENT ADMISSIONS: What can we learn from the experience of other universities?

4.1 It is widely recognised across the sector that the student admissions policy is a particularly significant policy, given its potential implications for the make-up of the student body institutions³ It has thus been subject to some form equality impact assessment in many universities.

³ Conducting Impact Assessments for Equal Opportunities in Higher Education – A Guide to good practice (2004) Equality Challenge Unit/ Higher Education Funding Council for England)
<http://www.kent.ac.uk/equalityanddiversity/impact-assessments/hefce2004.pdf>

4.2 EIAs at other universities 45 Universities in the UK were contacted via email or telephone in April 2008 to ask if an equality impact assessment on student admissions had been conducted. In addition to this, university websites were also searched for evidence of an equality impact assessment on student admissions. As part of the search the *admin-eo* list on *JISCmail* was also used. This list is aimed at anyone with an interest in equal opportunities in Higher Education and is a useful resource for sharing information.

4.3 This search found that universities were at very different stages with respect to their plans for impact assessment. 15 universities had made minimal progress in this area. 18 universities had begun (or stated their intentions) to conduct an equality impact assessment. This included some who had mapped their policies and procedures and others who were planning to deliver training for departmental staff who would be undertaking the impact assessments. A further 7 universities reported that they had made good progress in conducting EIAs. On closer examination, however, it was evident that only one of these universities had conducted a full equality impact assessment and that had not been on the student admissions policy

4.4 Only five universities had full reports to share on their EIAs of student admissions (of which two were from Northern Ireland, two were from England and one from Wales).

4.5 University 1. Quantitative analysis of applications and offers revealed that:

- 1.** Applications from 'White-British' students far out-weighed those from ethnic minority students.
- 2.** The ratio of offers to applications was significantly lower for 'Black' students than for other ethnic groups.

Consultation with student representatives in focus groups found no adverse comments regarding issues related to ethnicity and diversity. The EIA concluded that the university did not discriminate and indeed that the university had a robust policy in terms of equality and

diversity. Recommendations included targeting BME students to encourage more applications; encouraging applicants to complete equality monitoring forms; analysing the reasons for students being rejected; and training in cultural awareness.

4.6 University 2 Quantitative analysis revealed that, compared to the situation nationally, minority ethnic applicants were less likely than white applicants to be admitted as students, and that students from some ethnic groups had disproportionately more trouble in meeting the university's entrance qualifications. In common with university 1, university 2 discovered no evidence of discrimination. Nonetheless, some students did express some reluctance to come to a university where there appeared to be few other minority ethnic students. In the light of this, a follow up assessment of impact in the area of race (and disability) equality was being planned for the academic year 2009-2010.

4.7 University 3 Quantitative analysis found no evidence that people from minority ethnic backgrounds were less likely to be admitted to the university than might be expected demographically. Nonetheless, the university reported that they were undertaking the following measures: a strategic review of the current admissions policy; taking equality data into consideration in the annual monitoring exercise; and the introduction of admissions tests as part of the selection process for Medicine and Dentistry in order to provide an additional objective selection criterion.

4.8 University 4 Quantitative analysis discovered no evidence that students from black and minority ethnic backgrounds were underrepresented in the student body. Nonetheless, the university agreed to a series of measures to encourage more applications from BME students.

4.9 University 5 Quantitative analysis revealed that BME applicants were less successful at every stage of the process than White applicants: 8.6% of offers were made to BME applicants, 7.6% of

those who accepted offers were from BME backgrounds, and only 6.3% of BME applicants were admitted having met the conditions of their offer. In contrast to the other four universities, University 5 was much less sanguine and more self critical. Informed by discussions with relevant staff of the way procedures operate in practice, it acknowledged that, while most Schools published admissions/selection criteria for their undergraduate courses, there was no systematic monitoring of how consistently the criteria were applied and indeed no data was collected on the method of selection or reasons for rejection. It also recognised that the tendency for some Schools to make offers as applications come in, and well before the official UCAS deadline, may put students on Access courses who apply later at a disadvantage. In the light of this, the report made a series of recommendations. These included: monitoring reasons for rejection; and providing better information to applicants on the method of selection used (interview, admissions tests etc) and the criteria used for evaluating personal statements.

4.10 Of the five reports, by far the most systematic were those produced by university 1 and 5. In these two cases, some deficiencies were identified and an action plan was produced to address and rectify these.

4.11 The search indicated that the University of Northampton's approach to equality impact assessment was comparatively advanced. A considerable number of initial screenings of policies have already been undertaken and they have drawn on systematic data and in some cases led to action. A few universities have gone further in conducting full equality impact assessments of admissions. In all these cases, a quantitative approach was predominant. What is noticeable, however, was the dearth of qualitative analysis that uncovered perceptions of the admissions process. Two of the reports drew upon focus groups with students and one drew upon discussions with pertinent staff. We decided methodologically to supplement the quantitative data by

conducting interviews with BME students and systematically interviewing appropriate admissions tutors. In addition, we chose to look at available student application forms and analyse the reasons given for rejecting candidates.

5 STUDENT ADMISSIONS AND ETHNICITY: A LITERATURE REVIEW

5.1 The most significant recent studies which involve exploring the experience of students and staff from minority ethnic groups have taken a primarily quantitative form, drawing primarily on figures from the Higher Education Statistics Agency (HESA). In the case of the most extensive study of students to be undertaken so far, such data were supplemented by a series of surveys and interviews conducted over two years (Connor et al, 2004). This research has been invaluable in debunking some cherished myths (Modood & Shiner, 1994; Carter et al, 1999; Connor et al, 2004).

5.2 **High participation rate in HE** Systematic data collection has contradicted the widely reiterated assertion that minority ethnic

students are under-represented in higher education in the sense that their proportions in higher education are lower than their proportions in the general population. Indeed by the early part of this century minority ethnic groups already comprised 16% of the undergraduate population in England as opposed to 9% of the working population (Connor et al, 2004). The higher rate of participation of students from minority ethnic groups compared to white students stemmed from 'their higher occupational aspirations and high levels of parental support' (Bagguley & Hussain, 2007: 4). This is not to say that there is no issue of under-representation. The overall figures mask gender differences. When these are taken into account, there is evidence that the higher education participation rate of Bangladeshi women drops below that of Whites and that the higher education participation rate of Caribbean men is only marginally higher than that of Whites (Connor et al, 2004).

5.3 Concentration in new universities The overall figures gloss over important status differences between higher education institutions. Controlling for these indicates that, 'with the exception of Chinese applicants, ethnic minority candidates are concentrated in new universities' (Shiner & Modood, 2002: 227) and are correspondingly less likely to be found in the old universities, from which employers prefer to recruit (Parekh, 2000), and medical schools (McManus et al, 1998).

5.4 Ethnic penalties What is particularly disturbing is 'strong evidence that minority candidates face an ethnic penalty [when applying to old universities]. Institutions in this sector are more likely to select white and, to a lesser extent, Chinese candidates from among a group of similarly qualified applicants. Although ethnic minority candidates may be admitted to old universities in reasonable numbers, they generally have to perform better than do their white peers in order to secure a place' (Shiner & Modood, 2002: 227-228).

5.5 A case study of 10 degree schemes drawn from a range of faculties at the University of Leeds identified a set of widely differing practices, with admissions being seen as a somewhat 'private process' (Law, 1996: 184). Little regulation was evident in the process by which applicants were admitted into higher education and admissions officers were allowed considerable discretion. Where there is considerable scope, as in this case, for subjective assessment in higher education, the risk of bias against applicants from minority ethnic groups is a more likely outcome. It may be that inequality is, in part, the result of unconscious assumptions about ethnic minorities that are shared across an institution.⁴

5.6 McManus et al.⁵, (1995) found that having a European surname predicted acceptance better than ethnic origin itself, implying direct discrimination. They also found that a study of medical schools showed that applicants from minority ethnic groups were 1.46 times less likely to be accepted even when qualifications and other factors were taken into account. The ethnicity returned on the UCAS application form of applicants is not made known to the institutions until after the application process is complete. This means that for direct discrimination to operate the ethnicity of the applicant would have to be deduced by other means and the most likely identification would be through the name⁶. It has been suggested that withholding names on

⁴ Shiner, M. & Modood, T. (2002) Help or Hindrance? Higher Education and the Route to Ethnic Equality. *British Journal of Sociology of Education*, Vol. 23, No. 2, 209 - 232 [Accessed from: <http://www.informaworld.com/smpp/content?content=10.1080/01425690220137729>]

⁵ McManus, Richards, Winder, Sproston, V Styles (1995) [Medical school applicants from ethnic minority groups: identifying if and when they are disadvantaged](http://www.bmj.com/cgi/content/full/310/6978/496). <http://www.bmj.com/cgi/content/full/310/6978/496>

⁶ **HE Admissions: Assessment of Bias** HEFCE Issues paper November 2004/47 <http://www.hefce.ac.uk/pubs/hefce/2005/>

UCAS forms till after the offer stage may help, but this has not been tested yet and may not be practical⁷

5.7 The concentration of students from minority ethnic groups in new universities goes some way to explain why, at least initially, they do less well in the labour market and are more likely to go on from degrees to further study or training (Connor et al, 2004) While the research into admissions has been revealing in pointing both to the success of students from minority groups in gaining access to higher education and to the persistence of significant barriers in old universities, it does not tell us about what happens to students once they have been accepted for admission to universities. As one writer puts it, 'It is significant that both HEIs, in their mission statements, and researchers have focused on access to the near exclusion of progression' (Bird, 1996: 16).

5.8 **Barriers to success** Although the research in this area is still quite limited it does reveal that, while students from minority ethnic groups are more likely to take HE qualifications than White students, they are also more likely to leave early (Black students more so than Asian students) and are also less likely to gain good honours degrees (Connor et al, 2004). 'Relative to White students, those from every non-White ethnic group are less likely to obtain good degrees and less likely to obtain first class degrees...The odds of an Asian student being awarded a good degree were half of those of a White student being awarded a good degree, whereas the odds of a Black student being awarded a good degree were a third of those of a White student being awarded a good degree' (Richardson, 2007: 10). What is more, 'even after controlling for the majority of factors which we would expect to have an impact on attainment, being from a minority ethnic

⁷ Conner, H, Tyers, C, Modood, T, Hillage, J (2004) Why the Difference? A closer look at Higher Education Minority Ethnic Students and Graduates
<http://www.dfes.gov.uk/research/data/uploadfiles/RR552.pdf>

community...is still statistically significant in explaining final attainment' Broecke & Nichols, 2007:3).

5.9 There is still relatively little research of a qualitative kind that has explored the experiences of students from minority ethnic groups. What there is, however, highlights the diversity of experiences of students who are all too often mistakenly envisaged as homogeneous (Bagguley & Hussain, 2007). In addition, this research challenges the notion of minority ethnic students as victims and emphasises their agency (Housee, 2004). The research also suggests that higher education institutions may be less meritocratic than most of us like to think and that 'the experience of racism in both learning and social situations' may not be exceptional (Modood & Ackland, 1998:165) especially in universities where there is not a 'critical mass' of students from minority ethnic groups (Bagguley & Hussain, 2007). The evidence here, however, is mixed. Connor et al found that 'final year students were highly satisfied and there was no evidence of any greater disadvantage felt by minority ethnic students on average at this stage. Few race relations issues at institutions were reported. However, one year on, some (and particularly Black and Asian graduates) when reflecting back, were less than satisfied with their institutional and course choices' (Connor et al, 2004: xviii).

6. ADMISSIONS AT THE UNIVERSITY OF NORTHAMPTON

6.1 The University of Northampton is committed to the principles of fair access and widening participation.

6.2 **Widening participation** The commitment to widening participation entails to widening participation a particular concern to increase the successful participation in higher education of students with low previous educational qualifications or no family history of

participation in higher education, those from lower socio-economic groups and those from Black and Asian communities⁸

6.3 Fair access A fair admissions system, according to the Schwartz report, is one that provides equal opportunity for all individuals, regardless of background, to gain admission to a course suited to their ability and aspirations. Fair admissions in this view entails: transparency, reliability, validity of assessment methods, selecting for merit, potential and diversity, the minimising of barriers and professionalism.⁹

6.4 University admissions policy In the light of the above, and its concern to sustain academic standards, the university's admissions policy seeks to ensure the integrity of its processes of admission and thresholds of entry without raising unnecessary barriers to learning. It is committed to the elimination of unfair discrimination; to the provision of equality of opportunity for all; and to extend opportunities in education, training and employment to all groups and particularly those identified as under-represented in Higher Education. As a consequence of the above the University has established policies and practices which ensure that each applicant is treated fairly and with consideration.

6.5 The University is expressly committed to treating all applicants fairly and equitably regardless of race, colour, ethnic or national origin, gender, sexual orientation, age, religious or political beliefs, membership of professional associations or trade unions, disability, marital status, family responsibility and socio-economic standing or any other category where discrimination cannot be reasonably justified. The University seeks to ensure that no unjustifiable requirements or conditions are

⁸http://www2.northampton.ac.uk/portal/page/portal/central_document_store/resources_management/29_personnel%20Management/29_4_policy_development/Equality%20Diversity%20Policy

³⁶<http://www2.northampton.ac.uk/portal/page/portal/AEP/Document%20Store/ED/EIA%20Admissions%20Policy%20Word%201731.doc>

⁹ Fair Admissions to Higher Education: Recommendations for Good Practice (Schwartz Report)
www.admissions-review.org.uk

imposed that could disadvantage individuals on any of the above grounds. In seeking to fulfil the commitments of its Admissions and Equality & Diversity Policy, the University wishes to effectively compensate for under representation by actively encouraging application from under represented groups.

6.6 As part of its commitment to widening access, University course admissions requirements are expected to emphasise an applicant's ability to benefit from and successfully complete the course. This will include motivation and ability demonstrated in ways other than via standard qualifications. All courses are required to state any specific entry requirements for potential applicants clearly in all material available to them.

6.7 Course selection processes and criteria are required to be transparent and ideally articulated in the form of an admissions criteria statement which should contain a statement of compliance with the University's Admissions and Equality and Diversity policies, and statement with regards to diversity and ability to benefit from and motivation to complete the course. The statement is expected to identify any specific requirements beyond the University's general entry requirements and outline what an applicant would normally be able to evidence in terms of knowledge, skills, abilities aptitudes, commitment and experience. The statement is expected to outline the admission procedure, any selection criteria and how the criteria are to be evidenced. Where an interview process is employed, the statement is expected to explain what this will entail, what an applicant will be expected to demonstrate and the criteria used to select successful candidates.

6.8 Delegation to Schools The principles enunciated in the university's admissions policy are expected to be met by each course.

How they are met is delegated to Schools. Of the two Schools examined in this report, The School of Education has developed its own individual policy¹⁰, which it expects course teams to implement, while the School of Health leaves it up to each course team to devise its own policy.

6.9 School of Education The purpose of the School policy is to ensure that the admissions processes and entry requirements are fair, transparent, explicit and fit for purpose in meeting both statutory obligations, such as the Race Relations (Amendment) Act, 2000 and institutional aspirations, such as widening participation imperatives.

6.10 Admissions tutors The day to day responsibility for admissions is delegated to admissions tutors. Admissions procedures, however, are reviewed regularly by the Senior Admissions Tutors, who also co-ordinate, monitor and manage the admissions and interview process, which includes liaison with external partnerships. They also consult with the School's Widening Participation committee, initiating activities to support the on-going drive for widening participation/social inclusion; and, in addition, they seek to ensure consistency and effectiveness of admissions tutor training.

6.11 Information to applicants Applicants are directed to the course details provided in both paper-based and electronic forms. The procedure for ensuring that information is provided in the correct format is assured through communication with the Director of Marketing and the University Admissions Officer. 'First level' marketing (e.g. university prospectus, web pages) and 'second level' marketing (e.g. course leaflets, regional advertisements) clearly state the pre-requisites for application. Students are directed to support materials within the School of Education's web pages. These include sample questions for the mathematics test and English task. Reference is also made to the TDA web site, particularly with respect to *ability to teach*.

¹⁰ School of Education Admissions Policy 2008

As specific cases arise, admissions tutors will add to a bank of “frequently-asked questions”.

6.12 Interviews Applicants are selected in the light of information from application forms, referees’ reports, personal statements, relevant experience, academic qualifications, advice from schools and the results of any entry tests or tasks. Admissions tutors are looking to recognise prior learning and experience where this is appropriate. The requirements below are determined by the TDA website for teachers:¹¹

A. Have the intellectual and academic capabilities needed to meet the required QTS standards (*this information is derived from UCAS forms, qualifications listed, presentation and literacy/numeracy tests*)

B. Possess the appropriate qualities, attitudes and values expected of a teacher;

C. Can read effectively and are able to communicate clearly and accurately in standard English (*applicants are asked to read from a piece of writing linked to the topic of their presentation*).

D. Have met the Secretary of State's requirements for physical and mental fitness to teach.

(*Health declaration form or if issues arise at application stage there might be informal meeting involving Student Services*)

6.11 Applicants are given adequate notice of interview dates (typically 10 working days minimum). They should not be subject to prejudice as a result of any disability, and reasonable adjustments are made to mitigate unfair discrimination. In circumstances where there appears to be justification to deny a place as a result of a student’s disability, whereby they cannot meet core competencies and where adjustment is unreasonable, attention is drawn to section 9.2 of the University’s admissions policy for students.

6.13 Interviews are normally moderated between colleagues, as this reduces the possibility of any dispute (a standard course specific ‘interview recording sheet’ is used to collect evidence of each candidate’s suitability to work with children and young people). Every

¹¹ http://www.tda.gov.uk/partners/ittstandards/guidance_08/itt/R3_3.aspx?pdf=1

effort is made to pursue details from applicants where 'trivial' omissions or inaccuracies are noted or suspected.

6.14 Interview screening is a necessarily involved process requiring extensive coordination of academic and administrative staff. At all stages of the process, a decision to accept or reject can only be made by a member of the academic staff under the direction of the relevant admissions tutor.

6.15 Decisions are expected to be relayed to applicants within the time frame declared at interview. Evidence of interview decisions are required to be recorded against clear criteria. Where applicants are rejected on the basis of these criteria, evidence needs to be recorded for future reference. A written record is kept of all interviewees, detailing strengths and weaknesses in the various assessed components of the proceedings. In the case of successful attendees, such information can form the basis of feedback to supplement an offer. Unsuccessful attendees have the right to brief written feedback upon request. This opportunity is made clear at the point of receipt of a letter of rejection. All decisions following interview are made on the basis of academic discussion and review. In most cases this includes representation from a partnership schools. In exceptional circumstances, the involvement of a partnership colleague may be substituted by an academic tutor.

6.16 **Selection methods and criteria** The selection methods used include, in addition to an interview, a mathematics test, a literacy task, a short presentation and a group discussion. Candidates are marked on: *Communication Skills* (ability to express ideas clearly; ability to listen/respond to others and awareness of effective teaching practice); *Subject Presentation* (ability to express ideas clearly; level of understanding of specialism and potential to succeed in specialism); a *literacy task* and a *numeracy test* (15 items). They are marked on a five-point scale from very good to very poor. There is a space on the

form to record the decision – rejection (and reason) or offer/conditional offer (including the conditions and the comments for the offer letter).

6.17 Complaints Written complaints, if appropriate, are expressly encouraged so that satisfactory follow-up can be assured and to facilitate best practice consistently across the School

6.18 School of Health In contrast to The School of Education, there is not one specific standardised admissions policy in The School of Health which course teams are required to implement. Instead, each course has its own admissions policy which is informed by the specific requirements of the relevant professional body (eg the Nursing and Midwifery Council, which requires that applicants meet specific criteria, including literacy and numeracy, good health and good character¹², and the General Social Care Council which stipulates that any applicant offered a social work place has to have been interviewed and meet specific criteria) and the course team's own deliberations and interpretation of the University Admissions policy.

6.19 The selection methods within the School of Health include numeracy and literacy tests as well as individual and group interviews. Candidates are normally selected for interview depending on how well they meet the entry requirements, relevant experience, personal statement and reference.

6.20 Selection day activities details are recorded on a mark sheet, where candidates in Nursing, for example are scored on: *Communication and interpersonal skills* (speaking, listening, self confidence and self awareness); *Team working skills* (enthusiasm/engagement, respect for others, negotiating and organising/leading) and *Thinking Skills* (relevant creativity and problem solving).

¹² <http://www.nmc-uk.org/aFrameDisplay.aspx?DocumentID=328>
I <http://www.nmc-uk.org/aFrameDisplay.aspx?DocumentID=171>

7. EQUALITY IMPACT ASSESSMENT OF ADMISSIONS

7.1 The following selecting courses within the Schools of Education and Health were looked at:

- BSc (Hons) Podiatry (*School of Health*)
- BSc (Hons) Midwifery (*School of Health*)
- BSc (Hons) Adult/Child Nursing (*School of Health*)
- BSc (Hons) Occupational Therapy (*School of Health*)
- BSc (Hons) Paramedic Science (*School of Health*)

- BA (Hons) Social Work (*School of Health*)
- BA (Hons) Primary Education (QTS) (*School of Education*)
- Postgraduate Certificate in Education (Primary) (PGCE) (*School of Education*)

In addition, the following selecting course in the School of the Arts was looked at:

- BA (Hons) Fashion (School of Arts)

7.2 Methods of data collection Drawing on best practice from EIAs in other universities, three methods were used to examine the admissions process on the above selecting courses.

7.3 Individual student application forms Application forms were looked at for the academic year 2007/8, for the above courses. This entailed examining individual applications forms where students were not made an offer for the selecting course and the reasons for rejection that were recorded. It was noted whether the applicant was white or from an ethnic minority background. Since there was no box for ethnicity on the form, this information was inferred from the applicant's nationality and their name.

7.4 Interviews with admissions tutors Admissions tutors for each of the selecting courses were interviewed to ask them to reflect on the admissions process in their area and on the university's findings of adverse offer rates overall for Black African Students on selecting courses. They were also asked to comment on the specific reasons given on the application forms for declining an applicant.

7.5 Interviews with students 6 BME students studying Social Welfare (who originally applied but did not gain admission to the Social Work course) and 2 BME students studying Early Childhood Studies (who originally applied for the BSc (Hons) Primary Education (QTS) programme but did not gain admission) were interviewed. The aim was to gain an insight into the experience of BME students who were not made an offer on the above selecting courses. Finally, the Vice

President Education and Welfare Officer (Student Union) was interviewed to gain some insight into the Student Union perspective.

7.6 Key findings from an examination of individual student application forms

The following table specifies the reasons given for rejecting applicants for identified selecting courses. Where more than one reason was stated, each is counted in the table. Two caveats need to be made. For the BSc (Hons) Occupational Therapy, the information regarding funding of the course was not made available to the university until late in the year with the result that admissions tutors could not inform potential applicants whether they were successful until late in the process. This meant that a considerably higher number of applicants than normal withdrew their application due to uncertainty. As a consequence there were not many application forms to examine. In addition to this problem, we faced an insuperable problem with BA (Hons) Primary Education (QTS) where we were not able to examine the application forms. This was because where applicants were not made an offer, their application forms were passed on for consideration on an alternative course, and the difficulty in locating these forms proved insuperable.

	Nursing (BME)	Nursing (White)	Midwifery (BME)	Midwifery (White)	Occupational Therapy (white)	Social Work (BME)	Social Work (White)
<i>course full</i>	1	1	0	0	0	0	0
<i>did not attend interview</i>	1	1	0	0	0	0	0
<i>overseas</i>	1	0	0	0	0	0	0
<i>academic reasons</i>	3	6	0	0	4	5	2
<i>experience</i>	2	2	0	0	0	4	1
<i>personal statement</i>	3	1	1	0	0	4	0
<i>better candidate</i>	3	14	1	0	0	0	0

<i>commitment/ poor case for application reference</i>	3	1	2	1	0	3	2
<i>test/interview</i>	1	0	0	0	0	2	3
<i>late application</i>	0	0	1	0	0	0	0
<i>understanding/ values</i>	0	0	0	0	0	4	4
<i>poor scores</i>	0	0	0	0	0	1	2
<i>No reason</i>	0	1	0	0	0	0	0

	PGCE (BME)	PGCE (White)	Paramedic Science (BME)	Paramedic Science (White)	Fashion (BME)	Podiatry BME	Podiatry (White)
<i>course full</i>	0	1	0	0	0	0	0
<i>did not attend interview</i>	0	2	0	1	0	0	0
<i>overseas</i>	0	0	0	0	0	0	0
<i>academic reasons</i>	2	1	0	1	0	1	1
<i>experience</i>	2	6	0	1	0	0	0
<i>personal statement</i>	0	0	1	0	0	0	0
<i>better candidate</i>	0	6	0	0	0	0	0

<i>commitment/ poor case for application reference</i>	0	0	0	0	0	1	1
<i>test/interview</i>	0	0	0	1	0	0	0
<i>late application</i>	1	0	0	1	0	0	0
<i>understanding/ values</i>	0	0	0	0	0	0	0
<i>poor scores</i>	0	0	0	4	0	0	0
<i>No driving licence</i>	0	0	0	2	0	0	0
<i>clearing</i>	0	0	0	0	1	0	0
<i>No reason</i>	0	0	0	0	2	0	0

7.7 The above table generally identifies similar reasons for rejecting both white and non-white candidates. The most common reason given for both was 'better candidate'

7.8 There was a slight tendency for non-white candidates to be rejected because of their '*personal statement*'.

7.9 The analysis did reveal some seeming oddities: In two of the Nursing courses, the reasons given for rejecting 2 Black African candidates were peculiar. In one case, the applicant was declined on the grounds of '*better candidate, no evidence of recent study*' when the application form demonstrated in their qualifications relevant recent study; and in the other case, the applicant was declined on the grounds of '*better candidate*' and yet the applicant had a 2.1 honours degree. It may have been appropriate to reject these applicants, but the reasons stated do not clarify why they were.

7.10 In some cases, the reasons given for rejection did not identify the criteria being employed. '*Better candidate*', the most common reason given, is a case in point.

7.11 There were scoring systems in place for Paramedic Science and Social Work but these were not completely transparent, at least to us. In the case of BSc (Hons) Paramedic Science, 15 out of a potential 455 applicants were accepted with the 15 applicants' scores ranging from

40 to 46 out of a possible 50. One Black African candidate was rejected, however, with a score 43 because of a '*weak personal statement*'".

7.12 Key findings from interviews with admissions tutors Ten admissions tutors were interviewed from the identified selecting courses. The findings from the interviews have been grouped into themes and shall be discussed in turn. **7.13 *The admissions process***

Admissions tutors emphasised the limited amount of places on their respective courses. Hence the reason why they had to be quite selective:

This year, we have had 360 applicants for 34 places so we have to have quite a stringent selection process. [Midwifery]

There are 300 applicants for 30 places [Social Work]

There are 150 applicants for 20 places - the chances of getting in are small - 24%. [Paramedic Science]

7.14 Tutors pointed out that the central importance of professional bodies in the determination of their admission criteria:

The application process is regulated by the General Social Care Council - a national body. Students will eventually become registered Social Workers - they need to become registered. They need to be suitable to practice. There is a code of ethics and values that they have to meet - which is a consequence of the General Social Care Council - they specify what criteria the candidate has to meet. Their values have to be consistent with the General Social Care Council's values [Social Work]

The criteria are set by TDA [Education: QTS/PGCE]

7.15 : Generally, there were two stages to the selection process: an application

stage and an interview stage. Podiatry was an exception in this regard:

It's time-consuming and in the past we have not got any better students, so that's why we don't interview

7.16 It was apparent that, in the application stage, tutors are looking for a range of things including a good academic record, a personal statement that demonstrates commitment to the course, appropriate and relevant experience and a positive reference:

we look ... firstly at the reference and personal statement – they should have some experience of OT; know what they are committing themselves to in terms of a career ; have knowledge and understanding of what OT is about [Occupational Therapy]

Academic qualifications are looked at as well as training in social care –voluntary work, experience of working with others, evidence of ability to communicate, motivation, understanding of social work Then they are judged on references – this must say something about the person – it should not be bland [Social Work]

[We look for] 5 days school experience in 2 years – this can be in a primary, national curriculum mainstream school. [Education: QTS/PGCE]

7.17 A range of methods are typically used on selection days. These include

literacy and numeracy tests, presentations, group discussions and individual interviews.

7.18 While tutors use different methods to assess different attributes, in some cases one method is used to assess applicants on a range of attributes:

In the group interview, we are looking at different things- their communication in a group situation; listening skills; content of their contribution; body language (gestures, eye contact) and relationships within the groups [Occupational Therapy]

7.19 In some cases, resource constraints prevent course teams from using particular methods and compromises have to be made. For the nursing courses there is a selection day involving 30 people:

What require them to do is an activity, during which we observe them to ascertain their interpersonal skills, communication skills – whether they listen to each other, whether they speak clearly in English. We don't have the resources to interview people individually or in small groups, so this is the next best thing. [Adult Nursing]

7.20 **Good practice** Admissions tutors often give applicants 'second chances'. They may ask the Admissions Team to contact students for further information when their application form is unclear; or they may give supportive feedback for areas of development and advise students to re-apply the following year; or they may be given a conditional offer.

They may be asked for other information – look at new information and be given another chance; we could have missed something. [Education: QTS/PGCE]

if people then contact me and ask me why didn't I get in, I send them off to do other courses and say if you can go and do an access course and come back to be in a year, so people do that so that's quite useful.... [Adult Nursing]

They may be sent a letter explaining weaknesses, but still made an offer... Students may get a place on course on the condition that they do extra work over the summer – for example more days school experience – but the tutors will need evidence of this. [Education: QTS/PGCE]

I don't dismiss them [generalised personal statements] out of hand. I ask admissions to contact the applicant and tell them, if they wish to become an adult nurse, to send another personal statement which tells me why, so we do give them an extra chance. [Adult Nursing]

7.21 There was a genuine wish to give potential applicants as much information about the course requirements as possible, in advance of the application process:

There is a chance to talk to tutors at the pre-application stage and at open days. Tutors go into schools for outreach work – this is done quite a bit at colleges in Leicester to encourage students to apply for the course. [Education: QTS/PGCE]

If they come and have a look around, we do make it clear that they do need experience and they need to understand what it is about and realise it's going to be a tough course. [Podiatry]

On open days we try and tell them what we are looking for; and try to spell out what we are looking for so it is even more transparent [Midwifery]

7.22 The website is often used to communicate what attributes the course team is looking for:

We have put this on our website, to make sure we were upfront about what we we're hoping for, and I think this is the key issue for potential discrimination [Children's nursing]

Also guiding them to the professional website - which stipulates what skills they need to have [Midwifery]

7.23 In some cases, tutors have modified their practice in the light of consultation.

We contacted the International Office and asked them to look at our topics for discussion and they made some suggestions and we altered our wording so it was clearer to the international applicants what we meant, so for example substance abuse - we put alcohol and drugs...excessive alcohol and drug use - so we put an explanation [Occupational Therapy]

7.24 **Fairness** Tutors were adamant that the admissions process was fair:

I think you need a level playing field and someone's ethnic background should not influence whether you think they can do the job or can't; it surely has to be based on the best candidates you have, regardless of colour or background [Midwifery]

7.25 The range of people on selection days was seen as helpful in this regard:

There would be an academic and someone from the ambulance trust; so we are interviewing from the university side of things and the ambulance trust from the employment side of things [Paramedic Science]

There are quite a few of us here on interview days and different people assess different things, so we try to be as fair and open as possible [Midwifery]

7.26 The use of mark sheets and the need to adhere to professional regulations were seen by some tutors as helpful in facilitating fairness:

The mark sheet for the interview shouldn't discriminate against anyone [Children's Nursing]

Everything we do needs to be fair. All students are assessed on the basis on their merit and on how they meet these criteria [Fashion]

We are trying to be fair to everyone and we do have regulations that govern us [Children's Nursing]

7.27 Low offer rate for Black African students The tutors emphasised that they took no account of ethnic differences in their selection, but instead made their decisions in the light of stated criteria:

The only reason I would not invite them for interview was if they did not have the potential to meet the criteria that we have for academic or reference, or personal statement indicated that they did not know what OT was or weren't committed to doing OT [Occupational Therapy]

We look for cases where there is the right person. It doesn't matter what race they are. All the people from the team come from the profession and they wouldn't make an offer to a black African because they want the workforce to reflect society. [Paramedic Science]

I have to say I do not differentiate – I look at all students and think, are you all performing or not. We haven't had that many black Africans. What we do have is some Asians, and a good student is a good student regardless of colour [Children's Nursing]

If someone's personal statement does not demonstrate they understand Midwifery, then they are not really applying for the course. [Midwifery]

"Course full" - that has been a reason in the past and if, for example if I happen to get a spate of late applications and they happen to be from Black Africans, for

example – then the answer would be that the course is full, but that would be full for anyone. [Adult Nursing]

"Better candidate" not a phrase I have ever used... but again it might mean that there is a better candidate with less qualifications, who has shown a better commitment to nursing. Just because they have a degree doesn't mean they are going to hack it in a nursing course. [Children's Nursing]

7.28 Some tutors were sceptical that their particular course actually did have a lower offer rate:

Don't think there is much difference...We have quite a few applicants from ethnic minorities...

Nothing about our application process seems to discriminate. Values are the key thing and govern the courses – for instance their take on diversity. This is not an issue for social work because of the nature of the course. It promotes diversity, different ethnicities, gender and disability. If it was an issue then it would need attention [Social Work]

I think if we are going to look at this seriously we need the break down for the course rather than the schools. Different courses are regulated by different things – like NMC and the government, so as a course we can respond rather than the whole school. I think the nursing course and the midwifery course skew the figures because we said at the time that it is not good giving us figures for The School of Health because Nursing and Midwifery have very different entry criteria based on rules [Children's Nursing]

I would be interested to see the statistics for podiatry in isolation because that would probably be slightly different from the rest of the school of health I think you will find that that it is not representative of the general statistics you have [Podiatry]

It needs to be more specific in terms of the courses - you are saying "School of Health" and we have a huge number of courses (Occupational Therapy)

7.29 Some admissions tutors explained that, if they were rejecting Black African students, it was not something that they were aware they were doing:

I wouldn't highlight them out. I would like to find out if I do reject more black Africans, but I suspect it could be not because they are black African but because of qualifications [Occupational Therapy]

We don't screen on ethnicity. It's something we find out afterwards so. Of the people we have seen apply it would have to be single figure black Africans... It's so blind, if we were biased it would be lost, unless you were going out of your way to be biased. It's not something you do [Paramedic Science]

I just make the offers strictly as they come to me and I really don't take much notice in a way of where people come from. I certainly don't have an idea in my mind that I won't take a person because of where they come from [Adult Nursing]

I come from a family that taught me from an early age - you do not discriminate, you look at the person – that's why I can't remember if they are black African, White

British, Asian – I can only think of the students we have sitting in class at the moment – I do not care what their backgrounds are [Children's Nursing]

7.30 Few tutors considered there to be significant differences in performance on selection days between applicants from different ethnic groups. A few, however, did refer to spoken English, contribution to group discussion and performance in interview:

Suppose the biggest problem we have is people's audibility. Also if people have a really west country accent from this country or a Scottish accent, that can also be very difficult to understand. I don't think it discriminates on an ethnic group [Midwifery]

We did reject one international applicant – she wasn't able to contribute to discussion. We had a Saudi Arabian student as well who came and didn't say anything. [Occupational Therapy]

Sometimes.....when we ask the standard question at interviews "Why should we select you?" ... "Because I have come from Zimbabwe" or "because I think you should because I have come for the interview". They can't articulate.... Not all of them by all means, but I have had a few that have said that they think it is their right to be given an opportunity [Midwifery]

7.31 On the other hand others pointed to the fact that applicants from some ethnic groups were more likely to have pertinent experience and be strongly motivated:

With some of our African students, some of them have done a lot of community work. Worked in nursing homes. as Health Care Assistants; their reasons are really around wanting to help people and having a real feeling for nursing the elderly. You can feel they really want to do it; so yes I think there is a bit of a difference in that our Black African have quite a few years of experience of the job behind them...A lot of them have the experience either in this country or Africa. The type of experience some of them have had in Africa seems absolutely fantastic to me, some of them have done some fantastic work in the community with AIDS victims and things like that [Adult Nursing]

7.32 It is recognised in some cases that the dearth of BME students on some courses is related to the fact that few apply:

This depends on the number of applicants, for example there is not many black PGCE students applying. There is outreach to aim to solve this problem. But it depends on the local areas and the amount of ethnic minority in the area. Also tutors are not representative Applications from black and ethnic groups are dealt in the same way as white applicants. [PGCE]

7.33 Even when offers are made, factors outside the course team's control can prevent offers being taken up:

I know that of the number of offers I make sometimes to Black Africans, they don't always take them up. I do know that. I know sometimes people don't turn up on the day when you have made them an offer and we may or may not find out that they have chosen somewhere else. Or you may find out that their residency status sometimes doesn't turn out to be satisfactory. [Adult Nursing]

So we are also tied by if people are British citizens or have permanence residency and that gets dealt with before we even see the forms, so that also affects our numbers. But we can only go with our regulations and what we get. [Children's nursing]

7.34 It was suggested by a few tutors that Black African candidates may face inadvertent and indirect discrimination.

I don't think there are people deliberately working against Black African Applicants - I would like to think this was true. I don't know...I think we are being as fair as we can. I know there is inadvertent discrimination and indirect discrimination, but I have looked through all kinds of thing to find if personally I can be indirectly discriminatory and nobody is perfect, but I can't see where I am [laughs]. [Adult Nursing]

I don't think people are deliberately doing anything untoward - I don't think people are deliberately picking one over another. But yes, I do think in principle this is something that needs to be sorted out [Children's Nursing]

7.35 Such inadvertent discrimination may stem from the reluctance of tutors to recognise the different life experiences of applicants. One tutor argued that, when looking at students' performance in the admission process, it is important to consider the expectations of the admissions tutor.

The cultural capital of lecturers who interviews them is important and their expectations...Take the example of an interview question, "Tell me about something you have read recently?"

A student might say it was a Bollywood magazine. I would say "Cool, tell me about that". We need to be also ready with the appropriate response. [Fashion]

7.36 There was a reluctance generally to attribute the lower offer rate to racism Only one tutor did:

I think broadly you are taking about racism - I don't know if there is any other way to dress it up. I don't think there is any level of ambiguity about this. I think It comes down to prejudices and racism. I don't know what else you want me to say! [Fashion]

7.37 Enhancing practice It was acknowledged by a number of tutors that the reasons given for rejecting applicants need to be more carefully spelt out:

Think generally people ought to be a little bit more upfront about the reasons for taking people and not taking people. I think it is insufficient to put on the bottom of a screening form, "better applicant". I try to put three or four points and to say why exactly why I haven't taken someone because when they get back to me which they normally do, they know what they have got. [Adult Nursing]

I have said we ought to have something where it actually itemises, so that if anyone takes over as admissions tutor they also follow the same thing. [Children's nursing]

7.38 One tutor felt that selection decisions were made in isolation and were left too much to individuals:

We do work as individuals, I just do the admissions for adult nursing, and no-one else does it with me. We don't work as a team so the decision is down to individual admissions tutors [Adult Nursing]

7.39 Many tutors saw the virtue of further pre-course advice:

There could be pre-HE study; how to reach a good attainment at the interview; advance of pre-course, pre-application support, [Education: QTS/PGCE]

First of all how to demystify the process of what the interview is about and what we are looking for. So I would communicate to admission tutors from FE colleges or foundations course I don't think I am seeing that it needs to be a two-tier approach – that we have to say something to black and ethnic minority that we would differently to white. I think if we give very clear advice to all applicants that's fine [Fashion]

7.40 Some tutors considered that it is all very well trying to make the application process clear, but that does not address a key problem, which was felt to be that there were not enough people applying from certain ethnic groups:

It would be more important to look at who is applying for the course and if courses are actually getting the applications from all groups – Aimhigher? [Podiatry]

Asian girls - their families don't like them coming into nursing because they see it as a very demeaning job, tend to go for things like doctors, pharmacy. Upper-class will go to become a Doctor; lower-class will be frightened off by Higher Education [Children's Nursing]

But we need to start with marketing; it's too late by the time we are looking at applications [Children's Nursing]

7.41 While some tutors welcomed outreach work, others had reservations about targeting black African groups:

I suppose you do what the Aimhigher people do – try and attract people who wouldn't normally aspire to HE to come – but that is not necessarily a black African problem. I don't think that targeting specific groups is the way forward [Occupational Therapy]

With black Africans – we are not getting the applicants and I don't know how you could change that, unless the university went out and specifically targeted them ... but then if you went out to recruit a specific groups, you don't know if they would meet the criteria and get through the rest of the process [Paramedic Science]

7.42 There was reluctance from tutors to change the admission criteria to facilitate a higher offer rate for BME students. Indeed tutors unanimously believed that this was not a good reason for changing the criteria and that doing so would lower academic standards:

I think obviously we do have to maintain academic standards and we can't shift those standards – as admissions tutor, it's quite important that I make sure that people who get on the course are going to complete and be successful on the course [Podiatry]

They may feel that they were only let in because they were Black African or they only got here because we allowed them to come on lower qualifications – I do think that people want to start the same as everyone else [Adult Nursing]

7.43 These courses are regulated and funded by professional bodies which would not permit changes to the criteria:

No, the problem is you are talking about a professional course, so they need to pass. When you think about it the National Health Service is paying the fees and this seven thousand a year, so there need to be people who can actually pass the course and one of the ways we can do this is through academic criteria. [Occupational Therapy]

We are regulated by the NMC so we can't just change them really [Children's Nursing]

7.45 The Students' perspective We sought to ascertain the perspectives of students especially BME students through interviews. We interviewed 2 BME students (one dual heritage and the other Indian) who had initially applied for BA (Hons) Education QTS but were turned down and instead were studying BA (Hons) Early Childhood Studies. We sought to gain a Student union perspective by interviewing the (White) Vice President (Education and Social Welfare). Finally, we drew upon some interviews conducted by a student studying BA (Hons) Social Welfare with 6 BME students studying Social Welfare and 1 BME student studying Mental Health Nursing. It should

be noted that most of these students (5) were on a undergraduate programme after being turned down for a degree with a professional qualification (social work (4) and teaching (1)).

7.46 The results of the interviews were very mixed. The two students on Early Childhood Studies were quite positive about their experience despite having been turned down for their preferred course. Both students believed that the admission process was fair and did not experience any discrimination:

I know that I wasn't accepted due to my points, but the amount of experience could have been looked into...I have not experienced any discrimination that I'm aware of!...The groups were quite well mixed and I think the application process regarding ethnic groups was fair. (Student one)

Yes I do believe it is fair. I do not think I am a victim of this. I felt the decision [to turn me down], I do not think it is to do with my ethnicity as I had the interview and the tutors met me in person and did give me an instant reply after the interview- but it was down the entry requirements which I did not meet (student two)

7.47 By contrast, the interviews with the other BME students prompted highly critical judgements of the admissions process. 5 of them felt that it exemplified clear indications of racial discrimination:

My perception is that I can easily meet the all the criteria [if] I had wanted to do, but there are so-called 'eligibility barriers' which make it impossible for people like me and there is no flexibility to allow ethnic minority applicants a chance (student one)

I think there is discrimination is the selection of the students - I think they try and cover up this discrimination- yes names are an issue...I knew that ethnic minorities would hardly get jobs after qualifying. Social work would have been my first choice, but I dreaded applying because of all the discrimination issues in existing practices - even clients have negative attitudes of BMEs (student two)

[The criteria are] easy to meet, but easier if you're English or with English name! (student four)

"People from ethnic minority backgrounds are not treated fairly or are continuously not given places even if they qualify (student five)

"Social work -. I think it looks like they already have certain people wanted for that course anyway! There is the 'eligibility' problem for ethnic people, NOT qualification problems! Social work places are RESERVED for British/Whites even if they do not qualify OR don't want to do it... It seems the process is targeted at certain 'names'. The selection process is unfair... I think the social work course is 'anti-ethnic minorities' as shown by the admissions process that is restrictive to them! Ethnic minority groups are treated differently in a negative way as if they have a 'disability' (student seven)

7.48 One student felt that that it is specifically the treatment of Black African students is bad:

Black Africans are treated differently in a negative way from the rest of ethnic minorities in the university (student two)

7.49 Another student felt that the process was unfair on all students:

I don't think the process is fair to students of 'all' ethnicities. My friend failed to get a place for social work too but she is now in her 2nd year social work in a different uni not this one!! [student three]

7.50 There was a widespread sense that BME students in particular faced significant barriers:

Obviously there are some barriers if they weren't there, maybe we would be a reasonable percentage of 'all ethnicities in 'all course [student three]

The admissions process is secretly done, with criteria remaining a mystery; hence it's a barrier. I wouldn't know if all ethnic groups are treated in the same way because the admissions process remains unknown/a secret to ethnic minorities. One cannot...challenge what they don't know – can they? (Student four)

7.51 These barriers partly related to the student perceptions of admissions tutors:

They think they understand them and stigmatise them in the process/they wrongly assume that they have 'special needs' (student seven)

They generalise 'all' ethnic minorities as one (student three)

It appears they allow stereotyping and prejudice to take over fair admission processes... institutional prejudice maybe? (student one)

7.52 Suggestions for enhancing practice included regular consultations with BME students and, somewhat surprisingly, no ethnic monitoring. In relation specifically to the admissions process, two recommendations were made relating to the need for more BME admissions tutors and anonymised applications

"An admissions process 'panel' made up of different ethnicities (student three)

"Admissions process should be done using numbers instead of names [because of a lecturer that said "funny names"..... Were treated less favourably by this lecture (student four)

7.53 The interview with the Student Union representative was not very revealing. He doubted whether the lower offer rate for Black African applicants was deliberate, but did acknowledge that there might be unwitting prejudice:

I wouldn't say there were any purposeful barriers... targeting just those ethnic minority students...

Maybe it is unconscious racism...If there is more black African admission tutors that would show diversity

7.54 It is difficult to know what to make of such mixed responses. For some, the admissions process is fair and there is no evidence of racial discrimination. For others, the admissions process is grossly unfair and there is clear evidence of racial discrimination. While we must remember that these are perceptions, they cannot be dismissed. They are very real for the participants whose actions are likely to be informed by their definition of what is going on. What the remarkably critical comments of some of the students indicate is that it is crucial for there to be better communication with and consultation with BME students. The perceptions of the BME students interviewed by the Social welfare student may or may not be accurate, but they clearly are not congruent with the perceptions of admissions tutors that we looked at earlier. It is crucial in this context that mechanisms are created that facilitate effective dialogue.

7.55 The data that we have analysed does not allow us to reach a definitive conclusion as to why Black Africans receive a lower offer rate on selecting courses. We certainly cannot conclude that admissions tutors act in a racially discriminatory fashion. While we come across three cases where students were turned down with good academic qualifications, admissions tutors make their judgements in relation to a range of criteria of which academic qualifications comprise only one. We cannot conclude therefore that even these three exceptional cases point to discriminatory treatment.

7.56 It is conceivable that the lower offer rate stems, as some admissions tutors argue, from the poorer overall performance of Black

African candidates on selection days in spoken English, contribution to group discussion and performance in interview. While admissions tutors acknowledge the need for such performance judgements to be made on the basis of explicit criteria, it was noticeable that the most popular reason given for rejecting candidates was 'better candidate'. When explicit criteria do not form the basis of judgements, the danger of unconscious assumptions playing a role becomes greater.

7.57 Although we are not able on the basis of the data collected to reach a definitive judgement as why Black Africans receive a lower offer rate on selecting courses, we were able to identify some good practice, much of it apparent in the university admissions admissions statement and School of Education admissions policy. Many of our recommendations entail the wider dissemination of this good practice. We were also able to find some discordance between the perceptions of admissions tutors and some (but not all) BME students. This finding also informs some of our recommendations.

APPENDIX 1: Initial screening of Admissions Policy and Procedures at the University of Northampton

Full Impact Assessment recommended:

YES (in respect of all "selecting" courses)

Other Action recommended:

That a briefing/training event is held for Directorate, Deans and Heads of Departments on Equality Impact Assessments (EIA) generally and the nature of internal and external consultation that must be held.

To request that UCAS provide "offer" information for all equality variables to enable monitoring to take place in the future.

That IPU be request to build into their annual work plan the production of admissions reports for offers (against applications) in respect of all equality variables if UCAS do not change as request in (1).

There needs to an improvement in the recording of reasons why applicants

are rejected, invited for interview or rejected. In some instances record keeping was very poor and there was not a transparent reason for rejection or audit trail.

That qualitative data is collected by way of a confidential survey/questionnaire to ascertain if there are particular needs (during the admissions process) that are not being met in respect of equality/diversity variables (gender, disability, ethnicity, sexual orientation, age, marital status).

Resources (by way of contracting out the work or releasing staff) will need to be identified to undertake the full EIA and survey, as recommended above

That this report is consulted on with community of interest groups both internally and externally and the full data/report in respect of the admissions process in 2003/4 is placed on the web-site and made available to the public as is required by legislation

Report written by: Paul Crofts

Date: September 29th 2005

Consultation: Dr. Maxine Rhodes (Director, OEPLL), Dr. Peter Bush (Pro-Rector, Academic), Judith Glashen (Equality & Diversity Officer – Staff)

1. What is the policy?

Admissions Policy

2. What is the aim, objective or purpose of the policy?

To facilitate the admission/section of students to the university and ensure fair and transparent admissions arrangements and decision making based on previously agreed and justifiable criteria.

3. Who wrote and/or has responsibility for reviewing the policy and who implements it?

Admissions Committee (Chair: Maxine Rhodes; Admission Officer: Paul Tebbutt)

4. Is the policy applied uniformly throughout the university?

YES and

NO

If 'no' what are the consequences in terms of the screening process?

Depending on the course, whether or not they are "recruiting" or "selecting" or whether they are professional/vocationally linked, will often determine how the

admissions process operates. Adverse and disproportionate impact is most likely in the context of “selecting” course and/or where there are multiple conditions or requirements being applied and/or where subjective criteria are being applied (e.g. following interviews).

5. Who are the stakeholders in relation to this policy (for example, the Funding Councils, UCAS)?

Applicants; academic staff; admissions staff; community of interest groups; UCAS

6. What data is available to facilitate the screening of this policy?

UCAS supplies detailed information on the operation of the admission process in respect of applications and acceptances (of offers) by age, disability, gender and ethnicity/race. However, UCAS only supplies information in respect of offers made by the university in respect of ethnicity/race. Given that offers are 100% in the control of the university it is strange that UCAS does not supply this information on a comprehensive basis for all equality variables. Offer information for UCN applicants is available via our own student record database and reports could be written by IPU to interrogate this on the basis of any variable needed. However, this is currently not in their work plan and would require some work. This year the information was not requested.

7. Is there any evidence of higher or lower participation or uptake by the following characteristics?

	Yes	No	Not known
Age		✓	
Disability		✓	
Gender		✓	
Marital Status			✓
Racial group	✓		
Religious belief			✓
Sexual orientation			✓

Please comment:

In respect of **Black/Africans** there is evidence of a disproportionately lower offer rate as compared to other racial/ethnic groups during the 2003/4 admissions process. There is no obvious evidence of disproportionate adverse impact in respect of other ethnic or equality groups for which statistical data exists.

Following a more detailed examination of the data in respect of applicants of **Black/African** origin there was some evidence that the following courses had adverse offer rates, as compared to white applicants:

- Nursing (Adult)
- Nursing (Child)
- **Nursing (learning Difficulties)**
- Nursing (Mental Health)
- Midwifery
- Social Work
- **Podiatry**
- **Primary Education (QTS)**
- **Engineering**
- **Computing**
- **Computing Systems**
- **Business Computing**

However, for those courses in **BOLD** (above) the number of Black African applicants was small (and most made only one offer less to Black African applicants than might be expected, as compared to that of white applicants).

A further analysis of the data was undertaken in respect of two of the above courses with more Black/African applicants: **Nursing (Adult)** and **Midwifery**. This was undertaken in conjunction with Paul Tebbutt (Admissions Officer). The following tentative conclusions can be drawn from this:

- **Of 15 Black/African applicants who were rejected for the Nursing course:**
 - 4 were late applications (and the course was full)
 - 4 failed to reply to requests for further information concerning their immigration status (some of them may have been eligible but it was unclear from their UCAS form)
 - 5 were clearly overseas students and ineligible for the course as laid down by the NHS
 - For one applicant there was no clear reason for rejection that could be identified from the paperwork
 - One applicant was rejected as a weak candidate all round (qualification/experience/knowledge)
- **Of 11 Black/African applicant who were rejected for the Midwifery course:**
 - 2 were late applications and the course was full
 - 5 were rejected as "weak" or there were "better candidates" However, in one of these cases they seemed to merit **at least** an interview and the words "invite for interview" were crossed out - indicating that this was the first decision made. There was no obvious explanation for this.
 - In 3 cases it was not possible to determine why they were rejected as no

application form could be found

- In one case there was no reply to a request for further information concerning immigration status

8. Is there any evidence that different groups have different needs, experiences, issues and priorities in relation to this policy?

	Yes	No	Not known
Age	✓		
Disability	✓		
Gender	✓		
Marital Status	✓		
Racial group	✓		
Religious belief	✓		
Sexual orientation	✓		

Note: A broad interpretation should be taken of the word 'evidence'. It should include anecdotal evidence and evidence derived from qualitative or quantitative analysis where available

Please comment:

Although there is no statistic evidence (e.g. from surveys or questionnaires) it is widely understood (although not necessarily fully taken on board!) that all the above groups have differing needs in respect of the operation of the admissions policy and process of one kind or another.

9. Have previous consultations with relevant groups, organisations or individuals indicated that policies of this type create problems specific to them?

	Yes	No	Not known
Age			✓
Disability			✓
Gender			✓
Marital Status			✓
Racial group			✓
Religious belief			✓
Sexual orientation			✓

APPENDIX 2: Second Impact Assessment of Admissions Policy and Procedures at the University of Northampton

Equality Impact Assessments Initial Screening Form

What is the policy/practice being screened? (Name/description of the policy or practice)

Admissions Policy

Full Impact Assessment recommended: YES

It is recommended that a full Equality Impact Assessment is held into the admission processes in respect of all **"selecting"** courses; to make recommendations to reduce the identified disproportionate adverse impact or under-representation identified equality groups and/or to provide an explanation as to why this cannot be done. An examination is also conducted into why some identified **"non-selecting"** courses are not making offers to some ethnic minority and disabled applicants

Other Action recommended:

1. We endeavour to obtain "offer" details in respect of age and gender from UCAS or via other means
2. That qualitative data is collected by way of a confidential survey/questionnaire to ascertain if there are particular needs (during the admissions process) that are not being met in respect of equality/diversity variables (gender, disability, ethnicity, sexual orientation, age, marital status).
3. Resources (by way of contracting out the work or releasing staff) will need to be identified to undertake this full EIA and survey, as recommended above
4. That there is full consultation with community of interest groups both internally and externally during the conduct of this full EIA.

Report written by: Paul Crofts

Date: December 18th 2006

Consultation to date: Paul Tebbutt, Terry Allen

What is the aim, objective or purpose of the policy/practice?

To facilitate the admission/selection of students to the university and ensure fair and transparent admissions arrangements and decision making based on previously agreed and justifiable criteria.

Who wrote and/or has responsibility for reviewing the policy/practice and/or who has responsibility for implementing it?

Lifelong Learning Committee: Chair: Maxine Rhodes; Admission Officer: Paul Tebbutt (admissions Officer)

Is the policy/practice applied uniformly throughout the University? Yes/No

If 'no' what are the consequences in terms of the screening process?

If 'no' what are the consequences in terms of the screening process?

Depending on the course, whether or not they are "recruiting" or "selecting" or whether they are professional/vocationally linked, will often determine how the admissions process operates. Adverse and disproportionate impact is most likely in the context of "selecting" course and/or where there are multiple conditions or requirements being applied and/or where subjective criteria are being applied (e.g. following interviews).

Who are the main internal and external stakeholders in relation to this policy (for example: staff and students, trade unions, etc)?

Applicants; academic staff; admissions staff; community of interest groups; UCAS

What data is available to facilitate the screening of this policy?

UCAS supplies detailed information on the operation of the admission process in respect of applications and acceptances (of offers) by age, disability, gender and ethnicity/race. However, UCAS only supplies information in respect of offers made by the university in respect of ethnicity/race. Given that offers are 100% in the control of the university it

is strange that UCAS does not supply this information on a comprehensive basis for all equality variables. Offer information for applicants is available via our own student record database and reports could be written by IPU to interrogate this on the basis of any variable needed. However, this is currently not in their work plan and would require some work. This year the information was not requested.

Is there any evidence of higher or lower participation or uptake by the following characteristics?

	Yes	No	Not known
Age		✓	
Disability	✓		
Gender		✓	
Marital Status			✓
Racial group	✓		
Religious belief			✓
Sexual orientation			✓

Note: A broad interpretation should be taken of the word 'evidence'. It should include anecdotal evidence and evidence derived from qualitative or quantitative analysis where available.

Please comment:

See Equality & Diversity Report No. 12 **"An Analysis of the Admissions Process 2003-5 (Full-time Undergraduate Courses Only)"**. This concluded (summary of main points):

- There are clearly disproportionate and adverse "offer" rates applying (in particular) in respect of applicants of Black-African ethnicity. This is now consistent over two years.
- This difference needs further detailed explanation/investigation.
- There are notable differences in offer rates for Black-African applicants to selecting courses (or groups of courses) in the School of Health and Education (QTS)
- There are also some non-selecting courses that have adverse offer rates for a wider group of Black applicants. These include course such as: Law, Health Studies, Fashion, Management/Business, and English.

There is no evidence that the admissions process overall adversely affects disabled students. However, some courses did not make offers to any disabled applicants

Is there any evidence that different groups have different needs, experiences, issues and priorities in relation to this policy?

	Yes	No	Not known
Age	✓		
Disability	✓		
Gender	✓		
Marital Status	✓		
Racial group	✓		
Religious belief	✓		
Sexual orientation	✓		

Note: A broad interpretation should be taken of the word 'evidence'. It should include anecdotal evidence and evidence derived from qualitative or quantitative analysis where available

Please comment:

Although there is no statistic evidence (e.g. from surveys or questionnaires) it is widely understood (although not necessarily fully taken on board!) that all the above groups have differing needs in respect of the operation of the admissions policy and process of one kind or another.

Have previous consultations with relevant groups, organisations or individuals indicated that policies of this type create problems specific to them?

	Yes	No	Not known
Age	✓		
Disability	✓		
Gender			✓
Marital Status			✓
Racial group			✓
Religious belief			✓
Sexual orientation			✓

Please comment:

There has been no specific consultation with "communities of interest" in respect of admissions. This issue needs to be considered as a matter of some urgency, as there is a legal requirement to consult.

Is there an opportunity to *promote equality of opportunity or good relations or positive attitudes* more effectively by altering the policy/practice, or by working with others internally or externally? Yes

Please elaborate:

Demonstrating the university's commitment to fair and equal admissions arrangements through consultation sends a very powerful message to "communities of interest" and the wider community about equality and

diversity.

Are there any relevant groups (internal or external to the university), committees, communities of interest, etc., which you believe should be consulted? Yes

Please Specify

Academic Boards and School Admissions Tutors
All Staff working in the Admissions Office
NLGBA and university LGBT Group
Northamptonshire REC
Ability Northants; Disabled Peoples Alliance Northants;
Faith groups (including university Chaplaincy, Islamic Society; Christian Union)
Mature Students Group
Students Union

What data is required in the future to ensure effective monitoring?

UCAS data on **offers** in respect of disability, gender and age
Survey of new students on their experience of the admissions process and needs (by reference to equality/diversity that were not met).

Is a full impact assessment recommended? Yes

Please elaborate:

It is a priority at this stage that "selecting courses" are subject to a full EIA as there are already identifiable adverse offer rates being identified that have to be clearly explained and justified.

The risk of disproportionate adverse impact and discrimination is highest for courses that are "selecting" compared to those that are "recruiting" (where the amount of discretion that can be exercised in making offers is substantially reduced if basic admissions criteria are met). It is therefore being recommended that a full EIA is undertaken in respect of all selecting courses.

In addition there is some evidence that non-selecting courses are not making offers to disabled and ethnic minority students. This too requires investigation and explanation.

Any other comments on the policy/practice and/or screening exercise or ideas around future consultation?

None