

Impact Assessment Report/Equality Analysis and Action Plan

Marketing, Admissions and Enrolment Policies, Practices, Procedures and Paperwork

Date: September 2010 Final Write-up

Impact Assessment Group:

Becky Voller – Equality and Diversity Officer

William McClelland – Assistant Principal responsible for Equality and Diversity

Michelle McGrath – Head of Marketing

Sandra Mayne – Head of Admissions

Jude Smit – Head of Learning Support

Daniel Dean – Vice Principal (when started assessing) and now Principal

Screening:

It was agreed during the initial screening process back in 2008 that this was an area that needed comprehensive assessing, primarily due to our Admissions Policy at the time and the results of the screening.

This is a report outlining the investigation and progress made to date on trying to ascertain more information. It also outlines how we have tried to improve equality and diversity.

NB for those who are unclear about the Impact Assessment, the assessment is the analysis, the discussion, the investigation and the subsequent actions, **not** this report. The report merely provides a record of what has been carried out to date.

Data Collected for the Impact Assessment:

- Informal complaints/hearsay and perceptions (see Appendix 4)
- Applicants (who did not enrol with us) feedback by equality strand BME (Appendix 1)

- Statistics – including:
 - admissions figures over the last three years
 - wider Surrey data as a point of comparison from the LSC (Appendix 5)
 - admissions figures for local, feeder schools as a point of comparison (Appendix 5)
- Student interviews/focus group (learning difficulty and gender – current students Appendix 3)
- Information from Michelle McGrath on Marketing (Appendix 2 a)
- Information from Jude Smit in Learning Support (Appendix 2b)
- Information from Sandra Mayne in Admissions (Appendix 2 c)

For assessing impact of paperwork:

- Application form
- Prospectus for 2009,2010,2011
- Interview materials from the Head of Marketing
- Interview materials from the Head of Admissions

1i) Information and Discussion regarding The Admissions Policy :

This assessment covers our day-time 16-19 cohort.

NB Adult Education Admissions is covered in the initial screening process but nothing was seen to be potentially discriminatory in the initial screening.

This assessment has covered both the old Admissions Policy (entry 2010) and the ethos behind the new policy piloted 2010.

The impact of the Admissions Policy, as it changes, will be something that needs measuring on an annual basis as it is constantly being changed for a variety of reasons, as agreed amongst SMT and the Governors.

Major changes have been put in place for Sept 2011 entry, including a new online system and we need to measure whether there has been any notable change to our cohort as a result of the Admissions Policy 2011 entry (approved December 2009).

Measuring impacts of the Admissions Policy for 2010 entry:

The reason that we have changed our policies more recently and indeed for 2011 and 12 cohorts is that the old policy was seen as too exclusive by some individuals both in the local community and further afield.

What needs to be noted however is that our policy of admissions always prioritises Elmbridge students. We have a duty to provide for those in our immediate community and to not do so could be seen as discriminatory i.e. not providing for the catchment that we have. For instance, a local 16-19 year old resident could have a disability and would have to travel outside of the area for 16-19 education, if we did not prioritise this area.

However, we have looked at ways to ensure that our policy is 'more inclusive' and does not discriminate on the grounds of disability (direct or indirect discrimination) or ethnicity.

1ii) The legacy policy:

The main issue with the old policy was concern over the ways in which the application forms were submitted. Our popularity, and a narrow window for submission meant that demand for places was high and this led to:

- Parents driving prospective students with completed applications to the college, to drop the forms off (in order to beat the post), often in the afternoon
- Those people adopting the postal system, being disadvantaged

In terms of impact, we felt this could potentially discriminate due to the fact that parents/guardians who were working longer hours, did not have access to anything but public transport or who were single parents with other commitments who could not advantage their children/wards by 'driving' the applications to college, to get ahead in the queue. It was also felt that there could also be implications for prospective students, parents/guardians with disabilities (indirect discrimination) or students who were carers. They may also have mitigating circumstances that meant they could not get the forms in as early or turn the form around as quickly.

Whilst we prioritise Elmbridge, students from the borough have a % of guaranteed places we also felt that the policy could disadvantage those who *did* want to apply from further away. We do have a large % of students who come to us from outside of the borough. We were concerned that as Elmbridge is predominantly white, middle class in demographic, it could

unintentionally prevent us from attracting a wider cohort of BME students: something that we think is important to do on a number of educational and community levels. If we disadvantaged those who lived a distance away we may also be limiting the applications from BME students.

The policy was therefore discussed by the Corporation and changes made.

1ii) The new policy:

The aim of the new policy was to change the application procedure from drop-off/posting of the form to an online process. It was felt by the Corporation that most people have access to a computer and even if they did not have one at home they could access one either at work, or a local library/Internet cafe or via a friend or relative.

In terms of ensuring the website was 'accessible' to those with disabilities the ILT strategy group looked at the navigability of the site.

Action: in order to ensure that the process of application is non discriminatory in a physical sense, using computers, we need to further test the accessibility of the site with a group of students with physical disabilities

1iii) Paperwork:

In terms of paperwork, throughout the process of the impact assessment, changes have been made to:

- The student application form
- The adult education application form
- Prospectuses since 2009 (covering 2009,2010, 2011)

This was a fairly instantaneous process. There was deemed nothing 'discriminatory' in any of this paperwork but instead, as part of the impact, we thought we would change and 'improve' paperwork as we went – namely by re-wording to try to encourage greater disclosure, which would then help us measure impact more accurately in the future. (paperwork available in E and D File 1)

The prospectuses have been carefully considered every year to actually try to increase diversity in the college community, through representing the range of students that we do have, in an attempt to challenge some of the misperceptions that are rumoured to exist in the wider community (see Appendix 4) .

There is nothing discriminatory in the prospectus. For the 2011 cohort, we ensured that it contained greater flagging of the Learning Support Facilities (in response to interviews held with some students with learning difficulties who suggested this (stakeholders – Appendix 3). This was to make it more obvious what was on offer and to have photos of the support team, to aid students in finding them at enrolment.

Action: we will need to check that this has flagged the study support area more readily (interview students with Learning Difficulties 2010 cohort)

Marketing have worked hard on a number of levels. With the Prospectus, they have ensured that there is a good range of students demonstrating protected characteristics (although this might not always be obvious) on the front page and inside but in natural friendship or classroom groups as we are conscious we want to represent the student population as it is and not artificially. We have also developed the Equality and Diversity Statement and moved it more prominently to page 5 – it was on Page 23 to show that it is at the forefront of what we do. Again, this is hoped to encourage a broader range of applications. Proving this will be a challenge.

1 iv) Investigation into our practices and procedures of marketing and admissions

There is nothing obvious in our practices and procedures in these areas e.g. the schools that we go out to or the marketing that we produce to suggest that there is discrimination against those with the protected characteristics of gender identification, sexual orientation, age, religion and belief. On the positive side, we found that having a Gay Straight Alliance has actually encouraged students to join us. One such individual emailed the GSA this summer and actually said that this was a motivator for her to come to college. She is now a member of the GSA and Student Council. We do not mention the GSA in the prospectus but it is on our website and in our newsletter. This might suggest that these media for communication are important to our overall college image.

Action: As an action, we should continue to monitor the messages presented through these forms of communication and their impact where possible.

1 v) Information and investigation into why our BME cohort of students is not bigger:

Looking at face value, it may seem to some that there might be something discriminatory about our marketing and admissions policy, practices, procedures and paperwork, if we are not generating a more ethnically diverse college population.

However, we have carried out comprehensive investigations into this to try to ensure that this is not the case. It is undeniable that our BME intake is notably lower than our White British.

- 2009 = 86.5% of our student population were categorised 'White British'
- 2010 = 85.6 % of our student population were categorised as 'White British'

The good news is that there has been an increase in the 2010/11 cohort of declared BME students although the figures are still statistically small. There is a slight increase in the Mixed category overall but it is about the same in other BME categories. The reason for the slight increase may not be down to the impact of our policies, practices and procedures in this area but rather to population shifts.

Another way in which we tried to ascertain why our BME cohort might be lower, was by looking at take-up rates of places applied for but not enrolled on. We also investigated 'take up' rates at college to try to ascertain whether there were any groups who were keen to start with but then decided not to enrol after attending Applicants Evening, Introduction Day etc. Take up rates are not hugely illuminating as evidence though as almost 50% of all students who apply don't enrol from a diverse range of backgrounds. Sometimes students apply to several places and there is no statistically significant difference between the % of White British students who apply but don't enrol and those who declare themselves BME on the application.

However we have telephoned some of those BME prospective students to see whether there is any pattern of behaviour or specific reason for lack of take-up that we have control over:

Of the individuals who identified themselves as BME but did not enrol: (26)

- 4 confirmed that they stayed on at school 6th Forms (wrote in to declare reason for withdrawal)
- 1 went to Tiffin Girls and one to Godalming(out of a choice of two or three), instead of us. This was a change from their school i.e. they did not stay on
- 4 didn't meet the grades and withdrew in advance

+ 3 students turned up to enrol but did not have the 5 GCSE's Grade A*-C required and they didn't qualify for the mixed programme.

For a full breakdown of comments of these potential stakeholders see Appendix 1.

There are also questions to be asked regarding the schools that they came from and the marketing there. One of our issues is that many schools with sixth forms of their own are reluctant to let us market in their schools as they obviously want to maintain their own cohorts. Some of these schools are:

- Teddington
- Rydens
- Hinchley Wood
- Ricard's Lodge
- Surbiton High
- Tiffins

In terms of data to further build on this, we also looked at the LSC's report which is useful if slightly old. This was the data they published in March 2009, looking back at 2007/8:

- o in terms of % of white and BME students in FE, the % of BME students is much lower in the area, suggesting that this isn't perhaps just a 6th Form issue.

In terms of school data, the LSC's PLASC report (2007-8) suggests that 5388 of the 6171 students in the 30 Surrey school sixth forms were White British/White Any Other Background, leaving only 738 BME students (including Mixed White/BME students). Clearly then, the smaller % is not just an issue to common to Esher and this is something to bear in mind when looking at the raw figures. On the positive, there is a 12% BME student population in 6th Forms on average in Surrey and Esher is in fact above average with 14% BME.

To filter this down so it is even more pertinent to us we have:

- asked the heads of our feeder schools to send us a BME breakdown of students that achieve our entry requirements in their institutions i.e. 5 A*-C grades. From this we hope to make sure there aren't a large proportion of the BME students in Elmbridge going elsewhere, if they have the grades. So far, we have only the data from one school. On its own it is fairly inconclusive.

In terms of information, we acquired data from one local feeder school. Others were again reluctant to pass on data. Within that institution, the number of BME students who attained the 5GCSE grades A-C was out of a total of 11 out of 16 BME students (excluding White Irish and White Other). We wanted to see whether there was a correlation between ethnicity and achievement in the school. We also wanted to find out whether there is a general pattern that BME males in particular, under achieve at GCSE in the area, then the fact that we are predominantly a Level 3 provider might explain why our BME population is relatively small.

In terms of feedback from the school, it was not broken down in terms of gender so again we could not measure if there is a male underachievement issue. The school cohort is also a relatively small number to judge things on i.e. 179. This may go on further to explain why our BME mix is small – it is not about us being discriminatory but rather few of these individuals reaching the entry requirements and there are few in the first place. This is something that the Elmbridge community perhaps needs to address as a whole.

As Richmond is one of our biggest providers, it would be useful to carry out similar analysis from schools there although acquiring that data could be very difficult. We were not able to extract the data either, from any other schools in Elmbridge.

To broaden the research, we also felt it was beneficial to look at national achievement rates at GCSE, to see whether there were any patterns in terms of achievement at GCSE amongst particular BME groups, that might then impact on their meeting the entry requirements for us.

According to national statistics from the National Pupil Database, the highest achieving ethnic groups in 2009 at GCSE were Chinese, Indian and Mixed White and Asian students. Interestingly, one of our largest BME groups in college is Mixed White and Asian at 2.2% suggesting perhaps a correlation between coming to us and GCSE achievement. Indian is our fourth largest group of BME students. We tend to recruit very few Chinese students. When looking at the Elmbridge Census Key Data to see whether we have a large Chinese population, that might indicate a problem with our recruitment practices, Chinese is not indicated as a category so it is very difficult to tell. This information needs further investigation.

We have also looked at the declared ethnicities of those individuals who have enrolled on Adult Education courses. In terms of %, there is fractionally higher % of BME individuals taking Adult Ed' classes than in the day-time 16-19 student body.

This could be due to a number of factors and possibly:

- Adults are less guided by friends as to where to go to study than younger students
- Transport may not be so much of a factor for adults
- There is a broad range of courses that don't all have GCSE entry requirements

On the positive side, within the local community, it might suggest that we are perceived as an accessible and diverse institution.

1 vi) Enrolment and Marketing:

As part of the impact assessment across the areas of Marketing, Admissions and Enrolment, with the main concern being our Admissions Policy, the analysis of Marketing and Enrolment practices did not in itself raise anything discriminatory. What is evident though is that there might be some *misperceptions* in the community that we are 'discriminatory' or elitist with entry requirements or less open to those with learning difficulties or disabilities than we actually are. (see Appendix 2a, 2c, 3a, 3b and 4). The interviews and focus groups came back positive. As well as looking at ethnicity, another key protected characteristic that was of concern was gender as we have had a higher proportion of females enrol at Esher over males for at least two years. What is clear is that there was nothing in our marketing and enrolment practices that seemed to be dissuading males from coming to us. This seemed to be more connected with national examination results at GCSE, where females are generally out performing males.

Action: to work on ensuring that we flag and really explain 'open access' and our entry requirements and learning support facilities more readily whilst marketing.

Conclusions:

- There is no concrete evidence that The Admissions Policy of 2009 is in any way discriminatory

Action: We have changed the policy and now need to monitor its impact

- There is no concrete evidence that our practices and procedures relating to Marketing, Admissions and Enrolment are discriminatory in the areas of gender (despite more females enrolling than males for the last three years) or disability (from a learning difficulty perspective). One of the key reasons for non enrolment would seem to be that we do not offer comprehensive Level 2 provision as an institution. This would seem to be a factor in why a % of BME and students with disabilities do not come to us due to not meeting the GCSE entry requirements.

Action: it is important that in our external marketing we make sure that stakeholders in the form of potential students do not perceive us to be 'exclusive' and that they are made clearer about our entry requirements (see Appendix 3a and 4 in particular).

Action: whilst it has been difficult to pinpoint here, it is clear that we should have more clarity on our 'reasonable adjustments' for students with disabilities with regard to entry requirements, particularly during enrolment. It is agreed that this information should be amended and highlighted in the enrolment folders for interviewers. Those with declared disabilities are always interviewed by SMT so that 'reasonable adjustments' can be made. Cases are judged according to whether there are any mitigating circumstances as to why the student did not get 5 GCSEs and that is more of an Admissions than enrolment issue.

Action Plan coming out of the Impact Assessment – to be fully realised in the E and D SAR for 2010 and 2011 (reflecting on the new policies).

The following action plan is a response to the document above.

This is clearly an area that needs year on year monitoring.

Action required:	How will this be achieved ?	Who is responsible + date:
We need to keep a comprehensive list of reasons as to why those who apply, but do not enrol, do not enrol. This is to ensure that there is nothing discriminatory in what we do	A formal system will be put in place whereby students who knowingly gain our entry requirements, are contacted for reasons why they did not come to us. We also need a more comprehensive 'withdrawal' form with a range of reasons why, encouraging them to be honest to help us in future. (This should happen year on year and particularly looking at students with declared disabilities and from BME backgrounds as this information will be more readily available at this stage – information about other protected characteristics will not be on the application forms so we cannot measure this)	Sandra Mayne , Ashley Bowden and William McClelland Select admin' staff e.g. Kelly, will be asked to call with a script of set questions to find out more.

	This can then feed into the E and D SAR QIP as required and/or further, immediate action can be taken.	
To investigate whether the new admissions policy (2011 entry) is in fact improving access for prospective students, relating to protected characteristics (and notably with regard to disability, ethnicity and gender) To investigate ways of further collecting data to broaden our knowledge about the wider community	Through further impact analysis and in particular through focus groups. The format of this needs to be decided.	Bill McClelland to investigate impact of new policy and implement process for this
There is hearsay that we are still regarded as a white, middle class college who favours 'private' school entrants. The marketing team need to work actively to ensure that this perception is quashed. (see Appendix 4)	Marketing strategies need to ensure clearer information outlining what 'open access' really means in literature that we produce and in local papers etc. + those outside of our immediate catchment. We need to develop a 'widening participation' strategy to keep applications as broad as possible and to include those from Richmond who are interested in A Level (as there are currently no 6 th Form Colleges there). This is already linked to the College's QIP for 2011.	Declan/Michelle, Becky and the SMT DMD to see Declan for a provisional meeting about this and BLV for a follow-up meeting to prepare a strategy report. April 2011
To broaden data gathering and information gathering even further to check the impact of our Open Evening and other marketing practices.	In the future, to measure the impact of Applicants Evenings/ Open Evenings to see whether there could be something not very inclusive about the college environment during that evening, that puts students off. This will be difficult to measure but further questioning in this area would be useful to further measure the impact of our practices. To ask individuals during Open Evening to complete a quick questionnaire about impressions to measure impact of the practices during Open Evening.	Marketing Team and A Bowden July 2012 (first Open Evening is in 2011 and we need a year through to see how it works before administering questionnaires)

<p>To further measure impact of our marketing practices and procedures, particularly in schools with a large no. of BME students and specialist schools with students with disabilities etc.</p>	<p>To conduct further analysis of take up rates from particular schools and measure correlation between amount of marketing in a particular school and no. of applications.</p>	<p>Declan/Michelle and SMT January 2012</p>
<p>In order to ensure that the process of application is non discriminatory in a physical sense</p>	<p>We need to further test the accessibility of the college application form on our site with a group of students with physical disabilities. This will need to be handled with great sensitivity. To ensure that all of our publicity literature explains that the application form is available in a variety of formats and that this is the case.</p>	<p>IT team and Learning Support centre + Sandra Mayne Prior to the next tranche of marketing and at Open Evening in July we should publicise this</p>
<p>In the future, under the new protected characteristics, we need to develop strategies to measure the impact of our Admissions, Marketing and Enrolment practices further, particularly encompassing new strands of religion and belief, sexual orientation and gender identification as well as the other protected characteristics already explored.</p>	<p>BLV to work with SMT and the Equalities Standing Group on developing strategies for data gathering, particularly with regard to religion and belief and sexual orientation/gender identification.</p>	<p>BLV, SMT and the Equalities Standing Group July 2011</p>