Equality Impact Assessment on the Student Residential Accommodation Policy

Final EQIA Report

June 2008

This document can also be made available on request, in alternative formats (including large print, computer disc and Braille), and in minority languages to meet the needs of those who are not fluent in English.
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Executive Summary

This report presents the results of an Equality Impact Assessment (EQIA) on the University of Ulster’s Student Residential Accommodation Policy. This Policy was screened in 2002, and as an outcome it was agreed that an EQIA would be undertaken. This decision to conduct an EQIA was based on the need to ensure that the accommodation available meets the needs of the students and is fit for purpose. In line with the University’s Equality Scheme, an EQIA Sub-group consisting of staff with relevant professional experience was set up in January 2007 to progress this EQIA.

Based on the evidence it considered, the Sub-group concluded that there were no negative or adverse impacts in relation to any of the Section 75 equality categories. However, a differential impact was identified with regard to the category of religious belief as data show a lower percentage of Catholic students living in University accommodation at Jordanstown compared with the overall percentage of Catholic students that lived away from home. This Sub-group concluded that this was due to external factors beyond the control of the University. Notwithstanding this, the EQIA Consultation Report included recommendations regarding possible actions to further promote equality of opportunity and good relations.

An EQIA Consultation Report and Response Pro-forma were prepared and made available for distribution to the public on 14 January 2008. The consultation period of 12 weeks closed on 28 March 2008. The University received three responses, from Help the Aged, Disability Action and Convocation within the University of Ulster. Help the Aged did not wish to make any comments on the EQIA. The University held a face-to-face meeting with Disability Action to discuss their response.

Findings from the consultation exercise did not indicate that the Sub-group had misinterpreted or overlooked any data, nor was any new information received. As a result of the findings of the consultation exercise, the University has committed to certain actions, which it believes will have a beneficial effect on the Section 75 categories and will further promote good relations.

The University would like to thank all who contributed to this EQIA.
Further copies of this report are available on the University’s website at
http://www.equality.ulster.ac.uk/scheme.html

If you have any queries about this document and/or its availability in alternative formats (including Braille, disk and audio cassette, and in minority languages to meet the needs of those who are not fluent in English) then please contact:

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Introduction

1 Section 75 of the Northern Ireland Act 1998 requires the University of Ulster in carrying out its functions, relating to Northern Ireland, to have due regard to the need to promote equality of opportunity:

- Between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- Between men and women generally;
- Between persons with a disability and person without; and
- Between persons with dependants and persons without.

2 In addition, and without prejudice to its obligation above, the University must also have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

3 The University set out in its Equality Scheme how it proposed to fulfil its statutory duties. It carried out a detailed policy screening exercise, in which it identified five policies that would be subject to Equality Impact Assessment over a five-year period. The Student Residential Accommodation Policy was one of the five policies 'screened in' for an EQIA. This decision to conduct an EQIA was based on the need to ensure that the accommodation available meets the needs of the students and is fit for purpose.

4 The University is fully committed to the fulfilment of its Section 75 obligations in all of its functions, including its objectives as a teaching, research and examining body within the provision of its Charter and Statutes. The University ensures that effective implementation of these obligations is supported with the necessary resources in terms of people, time and finance.

5 In line with the University's Equality Scheme, an EQIA Sub-group consisting of staff with relevant professional experience was set up in January 2007 to progress this EQIA. The Sub-group was chaired by Professor Robert Hutchinson, Dean of the Ulster Business School (formerly known as the Faculty of Business & Management).

6 The Sub-group considered a wide range of data to assess the impact of the Policy on the nine Section 75 equality categories.
Based on the evidence it considered, the Sub-group concluded that there were no negative or adverse impacts in relation to any of the Section 75 equality categories. However, a differential impact was identified with regard to the category of religious belief, as data show a lower percentage of Catholic students living in University accommodation at Jordanstown compared with the overall percentage of Catholic students who live away from home. The Sub-group concluded that this was due to external factors beyond the control of the University. Notwithstanding this, the EQIA Consultation Report included recommendations regarding possible actions to promote equality of opportunity and good relations further.

This report outlines the results and outcomes of the Equality Impact Assessment.
The Student Residential Policy

9 The University of Ulster aims to offer high quality accommodation for students in University residences. Residential Services will allocate spaces fairly and without bias, basing their decision upon the information provided by the applicant on the application form. Residential Services are committed to encouraging diversity and inclusiveness within University residences. The Residential Service Student Charter sets out the standards of provision that the University aims to provide for its students in University residences. Performance is measured against key indicators contained within the Charter. The University regularly measures the effectiveness of residential provision through student surveys and discussions with the Students’ Union.

10 The policy sets out the allocation criteria used in the allocation of student accommodation to students when demand exceeds supply\(^1\). When residential places are in high demand, it will not be possible to offer accommodation to everyone who makes an application. At these times, the following allocation criteria are brought into use to ensure that those applicants with greatest need are given priority\(^2\).

11 Priority is given to new full-time first year undergraduate students. However, the University cannot guarantee accommodation (when demand exceeds supply), so students who have a conditional firm offer of an academic place at the University will be guaranteed an offer of residential accommodation provided they make the University of Ulster their first choice and return their completed accommodation application form by 1 July.

12 A number of residential places are set aside for returning final year and post-graduate students. Dedicated blocks of accommodation removed from the residences of first year students, are available for postgraduate students.

13 The University guarantees an offer of accommodation to all international students for the duration of their full-time study at the University. This guarantee only applies to students who are categorised as ‘overseas’ for fee purposes, and whose completed

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\(^1\) It is important to note that demand for student accommodation has not exceeded supply in the past three years and therefore the University has not used the allocation criteria during the timescale of this EQIA.

\(^2\) The allocation criteria are weighted towards students: pursuing a full-time undergraduate degree course at the University; who are new to the University; who live too far away to be able to find private rented accommodation; and who have additional/specific social and physical needs.
application form and Booking Fee of £100 are received by 1 August in the year of admission³.

14 Students from outside the European Union who apply to the University under the Exchange or Study Abroad programmes for one semester only, will also be guaranteed an offer of accommodation provided that their completed application form and Booking Fee are received before the deadline required for that semester in the year of admission⁴.

15 Students from within the European Union on exchange or other programmes, (for example ERASMUS), may be offered accommodation, provided there are vacancies remaining. Such students will also be given assistance to find accommodation locally.

16 The University appreciates that students from overseas countries have particular needs and an International Student Handbook was designed to help and assist international students. The University and the Students’ Union also provide a comprehensive international student orientation programme to familiarise students with University policies, procedures and working practices, thus helping international students to settle into life at the University.

17 The University aims to provide the greatest level of care and support for every University of Ulster disabled student⁵. The University has fully accessible rooms at Jordanstown, Coleraine and Magee campuses, which are suitable for a wheelchair user or student with mobility difficulties. The University is committed to ensuring that other accommodation may be modified to suit individual requirements. Some accommodation blocks also offer facilities to accommodate carers, if required.

18 Most accommodation is in the form of single study bedrooms in 5/6 bed apartments. However, on all campuses there are smaller flats and apartments, and applications from student parents and families can be considered where suitable accommodation is available. Double bedded rooms and flats may, on request, be made available to

³ Some applications may be accepted after the 1 August deadline, subject to availability.
⁴ For Semester 1 applications should be received by 1 August in the year of admission; an offer of accommodation for Semester 2 is guaranteed provided an application form is received by 30 November in the year of admission (applications may be accepted after the deadlines, subject to availability).
⁵ Reference to ‘disability’ includes a wide range of impairments and conditions including physical or sensory impairments; mental health difficulties, e.g. depression; specific learning difficulties, e.g. dyslexia; and health conditions, e.g. epilepsy.
couples. On-campus nurseries also operate at Jordanstown, Coleraine and Magee Campus.

Associated policies

19 The Student Residential Accommodation Policy is associated with the University’s Widening Participation Strategy. The University recognises that an accommodation policy which provides quality and accessible accommodation for a wide range of people will contribute to the Widening Participation Strategy.
Data Collection

20 In conducting the EQIA, the Sub-group considered a wide range of data including existing quantitative and qualitative institutional data, research reports, data gathered from pre-consultation meetings and student focus groups, and miscellaneous data.

21 In conducting the EQIA, the Sub-group took account of data and research from the following sources:

- data on the type of University residential accommodation available on campus;
- monitoring data on University of Ulster students living away from home and students living on campus during 2006/07;
- data on early leavers from University residential accommodation during 2006/07;
- data collected as a result of previous consultation exercises;
- data from the University’s student residential accommodation survey in 2005/06;
- data collected as a result of pre-consultation meetings;
- information from research reports; and
- data collected from focus groups with undergraduate students at Jordanstown in October 2007.

22 The majority of students (59%) living in University residential accommodation during 2006/07 were first year full-time undergraduates. Therefore, the EQIA Sub-group focused on this group for further analysis. The Sub-group felt that data on students living away from home would provide an appropriate comparator against which student intake to University accommodation could be assessed, to identify if there are adverse or differential impacts on any Section 75 categories. Available equality data on first year full-time undergraduates living in University residential accommodation on campus were compared to all first year undergraduates living away from home.

23 The Sub-group also reviewed equality data on postgraduate students who lived in University residential accommodation during 2006/07. The data showed the majority of postgraduate students living in University residential accommodation are overseas students reflecting the Policy which guarantees a room for overseas students if they apply within the time frame.
24 The Sub-group concluded that there were no adverse impacts in relation to any of the Section 75 equality categories. However, a differential impact was identified with regard to the category of religious belief as data show a lower percentage of Catholic students living in University accommodation at Jordanstown compared with the overall percentage of Catholic students that lived away from home.

25 As a result of these findings, the Sub-group arranged focus groups in October 2007 with first year Protestant and Catholic students living in University accommodation at Jordanstown and private rented accommodation in Belfast to gather qualitative information on factors influencing choices of accommodation. A total of 23 students participated in focus groups and interviews.

26 Focus group data showed that a lower percentage of Catholic students living in University accommodation may be as a result of first year Catholic students planning and choosing to live in a shared house in Belfast with other students from their school or local area. The focus groups indicated that students who lived in University accommodation at Jordanstown tended to come ‘on their own’ or with one other student from their school or local area.

27 The data also indicated that students coming to University ‘on their own’ are more likely to be Protestant students[^6], and are therefore more likely to live in University accommodation at Jordanstown.

28 Although no adverse impacts were identified, the EQIA Consultation Report included recommendations regarding possible actions to promote equality of opportunity and good relations further. Following the consultation exercise, the University has committed to certain actions, which it believes will have a beneficial effect on the Section 75 categories and will further promote good relations.

[^6]: This reflects the findings of the 2006 EQIA on the University of Ulster’s Student Admissions Policy, which highlighted that Protestant students are twice as likely as Catholic students to leave and study outside Northern Ireland. The result of this pattern of migration is that Protestant students are more likely to come to the University of Ulster ‘on their own’.
Consultation and Key Findings

29 In accordance with its Equality Scheme and the requirements of Section 75, an EQIA Consultation Report and Response Pro-forma were prepared and made available for distribution to the public on 14 January 2008. The following actions were subsequently taken:

- Prominent advertisements were placed in six local and regional newspapers inviting the public to comment;
- An executive summary of the EQIA Consultation report was sent directly to the University’s standard Section 75 consultee list and additional stakeholders consultees;
- An all-staff and all-student email was posted to advise of the consultation exercise;
- The consultation documentation was posted on the University of Ulster’s website;
- Posters were displayed in students residences to encourage students to respond; and
- The report was made available by request in alternative formats (no requests were received).

30 The 12 week consultation period ended on Friday 28 March 2008. The University received three responses, from Help the Aged, Disability Action and Convocation within the University of Ulster. Help the Aged did not wish to make any comments on the EQIA.
31 The response to this consultation was lower than expected. Findings from the consultation exercise did not indicate that the Sub-group had misinterpreted or overlooked any data, nor was any new information received. The University held a meeting with Disability Action in April 2008 discuss their response.

32 The key issues arising from the consultation responses and the University of Ulster response are summarised in Table 1 below:

Table 1 Summary of Key Findings

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<thead>
<tr>
<th>Disability Action</th>
<th>University of Ulster Response</th>
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<tbody>
<tr>
<td>Publicity and marketing materials about residential accommodation could be examined to ensure that information and images presented include disabled people, therefore helping to encourage disabled people to apply.</td>
<td>A review of the University’s advertising/marketing policy to ensure that disabled people are portrayed in a positive role is a key activity within the University’s Disability and SENDO Action Plans. This activity will include a review of the advertising/marketing with regard to student residential accommodation.</td>
</tr>
<tr>
<td>Web based material should be accessible.</td>
<td>A Web Re-development Working Group was established at the University during the equality impact assessment process. Equality and Diversity Services will liaise with this Group to ensure that the University’s web page is W3C compliant. It will also liaise with the Director of Communication and Development to ensure that the University’s Web Policy and Guidelines are reviewed in terms of designing accessible web content and if necessary, updated. Currently all e-Learning content developed by the Institute of Lifelong Learning complies with the W3C guidelines.</td>
</tr>
<tr>
<td>Information about all residential accommodation should be made available in alternative formats.</td>
<td>The University will review all documentation in relation to student residential accommodation to ensure that it is clearly stated that information can be made available in alternative formats, on</td>
</tr>
</tbody>
</table>
Disability Action welcomes the availability of 20 new fully accessible accommodation units at Jordanstown. However more information was requested on what the University is doing with regard to students who do not declare a disability.

Students applying to the University through UCAS are requested to indicate if they have a disability. This information is passed to Disability Services who then contact the student in order to assess the support required in advance of their arrival. Students are also given an opportunity to disclose a disability when applying for accommodation.

There is no duty on a student to disclose his/her disability, and some students may prefer not to disclose a disability for various reasons. However in general, it is in a student’s best interests to disclose his/her disability so that the University can assess the support required and allocate accommodation which is most suitable for the student.

The University has recently developed draft Disclosure Guidelines which will assist staff in creating appropriate opportunities for disclosure (at any time during the period of study so that reasonable adjustment requirements can be made). The guidelines explain that all disability information will be used only for the purposes of providing reasonable adjustments and for planning purposes, in line with the Data Protection Act 1998; and that University staff cannot unlawfully discriminate against a disabled student as a result of their disclosure and the University will treat complaints regarding discrimination in a serious manner.

Disability Action were concerned that, in the EQIA Consultation Report, the University did not state that a system will be put in place to monitor this policy.

The EQIA did not indicate any adverse impacts for any of the nine Section 75 groups. Notwithstanding this, University is committed to monitoring the impact of the policy in two years’ time and will publish the results of its review in its annual report on progress to the Equality Commission.
<table>
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<th>2. Convocation</th>
<th>University of Ulster Response</th>
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<tbody>
<tr>
<td>Students from the Republic of Ireland are sometimes younger than entrants from Northern Ireland or GB. While legally they are under the age of consent, are their applications for accommodation treated the same as for older applicants?</td>
<td>Student Support liaises with students who are under the age of 18 making them aware of the support available within the University and the obligations that they are required to adhere to. The University also has a child protection policy, see <a href="http://plangov.ulster.ac.uk/governance/policy.html">http://plangov.ulster.ac.uk/governance/policy.html</a> Residential Services do not currently require parents to enter into a contract on behalf of a student under 18. The majority of such students turn 18 soon after having commenced University and are deemed to have sufficient maturity and cognisance to understand and enter into a licensee agreement for accommodation.</td>
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<tr>
<td>Is there a policy regarding dual occupation of flats/houses by same/sex students?</td>
<td>The application form for accommodation does not require students to indicate their sexual orientation. Residential Services considers requests for dual occupation from any students irrespective of their sexual orientation. The EQIA found no evidence to suggest that the policy has an adverse impact in respect of a person’s sexual orientation.</td>
</tr>
<tr>
<td>Ramps installed on campus have caused problems for wheelchair users.</td>
<td>Residential Services liaised with PRD for ramps to be installed at the entrance to the Student Village to address the issue of speeding cars. The ramps installed are semi-ramps allowing access for wheelchair users to and from the Village without having to go over the ramps.</td>
</tr>
<tr>
<td>In cases of a general or local election, are residents forbidden from displaying material showing political affiliation. This would seem to contravene freedom of speech if it is so.</td>
<td>The University has a protocol on political activities (currently under review) that seeks to maintain a neutral environment. Students would be discouraged from displaying political material in University residences as it would contravene the University’s policy of maintaining a neutral environment and may cause offence. This may also in some circumstances contravene the University’s Bullying and Harassment Policy.</td>
</tr>
<tr>
<td>2. Convocation cont’d</td>
<td>University of Ulster Response</td>
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<tr>
<td>Is consideration given to the impact of student from racial groups living in University managed accommodation in the local community who may not be as open to cultural differences as the University community?</td>
<td>The University appreciates that students from overseas countries have particular needs and an International Student Handbook was therefore designed to help and assist international students.</td>
</tr>
<tr>
<td></td>
<td>The University and the Students’ Union also provide a comprehensive international student orientation programme to familiarise students with University policies, procedures and working practices, thus helping international students to settle into life at the University and in Northern Ireland generally.</td>
</tr>
<tr>
<td></td>
<td>The PSNI attend these events and gives advice on personal protection and crime prevention.</td>
</tr>
<tr>
<td>Where particular religious observances are required, this could cause difficulties in residence with students from other traditions, in particular where food has to be prepared in certain ways.</td>
<td>Any specific religious requirement can be addressed on an individual basis by Residential Services, i.e. provision of an individual fridge in a shared flat or provision of a 1 bedroom apartment.</td>
</tr>
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CONCLUSIONS

33 The University of Ulster aims to offer high quality accommodation for students in University residences. The University is committed to providing an inclusive, accessible, and welcoming environment for students in residential accommodation and embraces diversity and promotes equality of opportunity and good relations.

34 Taking into account the comments from the consultation exercise and the outcomes in the EQIA Consultation Document, the University of Ulster has agreed specific actions arising from the EQIA which will further promote equality of opportunity and good relations. This is attached as Appendix A.

35 The University is committed to monitoring the impact of the policy and will publish the results of monitoring in its annual report on Section 75 progress to the Equality Commission for Northern Ireland.

36 If you have any queries about this document and/or its availability in alternative formats, please contact:

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### APPENDIX A - EQIA Action Plan

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<th>Recommendation/Action</th>
<th>Responsibility</th>
<th>Performance Measures</th>
<th>Timescale</th>
<th>Expected Outcome</th>
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<tbody>
<tr>
<td>1. Review and update information for staff and students with regard to residential accommodation and disability issues to include:</td>
<td></td>
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<tr>
<td>- A review of existing documentation from student support services;</td>
<td>Residential Services / Equality &amp; Diversity Services / Student Support Services</td>
<td>- Revised and updated documents</td>
<td>June 2009</td>
<td>Provide information to prospective / current disabled students on University accommodation.</td>
</tr>
<tr>
<td>- A review of existing documentation from Residential Services;</td>
<td></td>
<td>- Evidence of positive response to requests for information</td>
<td></td>
<td>Promote an inclusive, accessible and welcoming residential living environment for students.</td>
</tr>
<tr>
<td>- Implementation of the new Disclosure Policy and Guidelines;</td>
<td></td>
<td>- Evidence of continuous monitoring</td>
<td></td>
<td>To increase and improve the participation of disabled students in the University of Ulster and within University owned / managed residential accommodation in line with the Widening Participation Strategy, the SENDO Strategy and the Disability Action Plan.</td>
</tr>
<tr>
<td>- A review of web-based information from Residential Services web pages; and</td>
<td></td>
<td>- Evidence of continuing dialogue with disabled students</td>
<td></td>
<td>Inform residential accommodation planning.</td>
</tr>
<tr>
<td>Recommendation/Action</td>
<td>Responsibility</td>
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| 2. Training on SENDO, the Disability Duties and the new Disclosure Policy and guidelines will be provided to accommodation staff and Resident Assistants. | Equality and Diversity Services / Staff Development | • Evidence of a programme of disability awareness training and timescales  
• Evidence of monitoring attendance at training events  
• Evidence of positive feedback from training events  
• Evidence of increased awareness of disability issues and a positive attitude to disability  
• Evidence of training reported within Disability Strategy and Action Plan and Section 75 Annual Progress report | June 2009 | Raise awareness of SENDO and equality and diversity.  
Inform staff in Residential Services of new disclosure policy and guidelines.  
Reduce vulnerability to litigation.  
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</table>
| 3. Review and improve the data collection methods for monitoring international students so as to reduce the percentage of 'not known' data. | Corporate Planning and Governance        | • Undertake review of data collected in 2007/08 to identify areas for improvement  
• Improved data collection if required following review                                 | June 2009 | Accurate student EO database                                                      
Inform equality and student planning                                                  |
| 4. Include specific questions relating to equality of opportunity and good relations in future annual student residential accommodation surveys. | Residential Services / Equality and Diversity Services | • Survey documentation  
• Evidence of performing survey exercise  
• Report on outcome of survey to committee  
• Evidence of continuous monitoring/ review                                             | June 2009 | Accurate quantitative and qualitative equality and good relations data             
Raise awareness of equality and good relations in residential accommodation            
Identify measures for future action                                                      
Inform student residential accommodation planning                                       |
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<tr>
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| 5. Review the practice of accommodating international students together and look at ways to increase cultural integration and awareness. | Residential Services / International Office / Student's Union | • Documentation of the review  
• Evidence of any recommendations for action arising from the review  
• Include any recommendations / actions in the University’s Good Relations Strategy (planned for 2008/09 using guidance from the Equality Commission) | June 2009 | Identify effective measures to promote integration of international students with local students  
Increased integration of international students with local students  
Promote cultural diversity and awareness  
Promote good relations between students of different religious beliefs and racial backgrounds |