

Equality Impact Assessment Form (EqIA)

As a public sector organisation, GSA has a legal duty under the Equality Act 2010 to assess the impact all of its new or revised policies, practices, procedures or projects may have on protected groups (as defined by the Act).

The purpose of this assessment is to use relevant evidence and critical thinking to identify any impact (positive, negative or neutral) the policy, practice, procedure or project that is being assessed may have on the people it affects or is intended for.

The EqIA is a tool which helps mainstream equality into everything GSA does. It requires us to consider how we can mitigate or eliminate negative impact and, in turn, advance positive outcomes. Therefore, it must be undertaken during the development / review of the policy, practice, procedure or project it refers to and not after it has been finalised. Ideally, EqIAs should be a team effort of relevant parties to ensure a variety of perspectives have been consulted. All finalised EqIAs must be signed off by an executive lead and either the Head of Student Support and Development or GSA's Equality Officer, however, support from the Equality Officer is available at any stage of completion.

Further guidance on how to complete an EqIA can be found on GSA's website and the Equality and Diversity section on the staff intranet. If you have any additional questions, please contact equality@gsa.ac.uk.

Name of Equality Impact Assessment (E.g. Area of decision making/title of policy, procedure, programme or relevant practice)	Code of Procedure for Appeals
New or reviewed	New
Owner/Review Lead and role	Fergus Mason
Department or School	Academic Registry
Date of assessment	May 2022

1. Purpose of policy / practice / procedure / project being assessed – brief description			
The Code of Procedure for Appeals (CoPA) is the route by which students are given the opportunity to raise an appeal against academic decisions without fear of disadvantage. A full revision of the existing CoPA has been undertaken in consultation with colleagues on the Glasgow School of Art’s Education Committee, and with the Glasgow School of Art Students’ Association (GSASA).			
2. Evidence used when undertaking this assessment – this can comprise of internal and external reports, survey data, etc			
2.1 The Equality Act 2010 2.2 The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 2.3 GSA Equality Impact Assessment Summary Reports 2.4 GSA Equality Outcomes 2021-2025 2.5 LGBT Youth Scotland Report Life in Scotland for LGBT Young People (2017) 2.6 Equality and Human Rights Commission Report Tackling Racial Harassment: Universities Challenged (2019) 2.7 The Scottish Public Services Ombudsman’s Complainants with Vulnerabilities resource 2.8 The House of Commons Library Research Briefing Sexual Harassment and Violence in Further and Higher Education (2022)			
3. Type of impact by protected characteristic – please provide details of the potential impact (could be more than just one type); make reference to relevant evidence (from the list you provided above) where applicable			
Age	Positive impact	Negative impact	Neutral impact
	No impact identified.	No specific impacts identified.	No impact identified.
Disability	Positive impact	Negative impact	Neutral impact
	No impact identified.	It is recognised that some students may find it difficult to raise appeals relating in some way to this protected characteristic due to the sensitive information involved. Additionally, the CoPA is set out in written form on the GSA website and it is recognised that students may face physical, sensory and communication barriers to raising appeals (due, for example, to visual impairment or	No impact identified.

		learning difficulties). Students with disabilities may also find it difficult to attend face-to-face meetings with staff, and as a result may find it difficult or daunting to raise an appeal. Reasonable adjustments relating to these are set out in Sections 4 and 5 below.	
Gender reassignment (covers Trans identities)	Positive impact	Negative impact	Neutral impact
	No impact identified.	National data (see Section 2.5 above) suggests that young people in education in Scotland can still face harassment, bullying and discrimination on the grounds of gender identity. It is recognised that some students may find it difficult to raise appeals relating in some way to this protected characteristic due to the sensitive information involved. Reasonable adjustments relating to these are set out in Sections 4 and 5 below.	No impact identified.
Marriage and Civil Partnership	Positive impact	Negative impact	Neutral impact
	No impact identified.	No specific impacts identified.	No impact identified.
Pregnancy and Maternity	Positive impact	Negative impact	Neutral impact
	No impact identified.	No specific impacts identified.	No impact identified.
Race	Positive impact	Negative impact	Neutral impact
	No impact identified.	Sector-wide evidence relating to race equality (see Section 2.6 above) identifies that on a UK-wide basis, Black and Minority Ethnic (BAME) students may be more likely to be subject to bullying/harassment or discrimination. It is also	No impact identified.

		recognised that students may be reticent in raising appeals due to reasons relating to cultural background. Reasonable adjustments relating to these are set out in Sections 4 and 5 below.	
Religion or Belief	Positive impact	Negative impact	Neutral impact
	No impact identified.	No specific impacts identified.	No impact identified.
Sex	Positive impact	Negative impact	Neutral impact
	No impact identified.	Students in Scotland can still face discrimination and harassment on the grounds of their gender. UK-wide data (see Section 2.8 above) suggests that female students are disproportionately affected by sexual violence. It is recognised that students may find it difficult to raise appeals relating to this protected characteristic, due to the potentially sensitive information involved. Reasonable adjustments relating to these are set out in Sections 4 and 5 below.	No impact identified.
Sexual orientation	Positive impact	Negative impact	Neutral impact
	No impact identified.	National data (see Section 2.5 above) suggests that young people in education in Scotland can still face harassment, bullying and discrimination on the grounds of sexual orientation. It is recognised that some students may find it difficult to raise appeals relating to this protected characteristic due to the sensitive information involved. Reasonable adjustments relating to these are set out in Sections 4 and 5 below.	No impact identified.
Impact on other groups:	Positive impact	Negative impact	Neutral impact

Mental Health	No impact identified.	Appeals can be highly emotive issues. This can be difficult for any appellant; however, this may create a particular barrier for people suffering from mental ill health, and students may struggle with anxiety and emotional distress as a result. It is also recognised that stigma around mental illness persists, and some students may find it difficult to raise appeals relating in some way to this issue. Reasonable adjustments relating to these are set out in Sections 4 and 5 below.	No impact identified.
Poor literacy or numeracy skills	No impact identified.	The CoPA is set out in written form on the GSA website, and appeals are submitted via a web-based form. It is recognised that students with poor literacy may find it difficult, or be reluctant, to raise an appeal because of this. Reasonable adjustments relating to these are set out in Sections 4 and 5 below.	No impact identified.
Digital exclusion	No impact identified.	The CoPA is set out in written form on the GSA website, and appeals are submitted via a web-based form. It may be difficult for students with little or no access to online services and/or poor digital literacy to learn about the CoPA and to submit an appeal. Reasonable adjustments relating to these are set out in Sections 4 and 5 below.	No impact identified.
Chronic or terminal illnesses	No impact identified.	It is recognised that students suffering from chronic or terminal illness may suffer from physical and/or emotional distress. It is further recognised that students in these situations may find it difficult to attend face-to-face meetings with staff. Reasonable adjustments relating to these are set out in Sections 4 and 5 below.	No impact identified.
People fleeing domestic abuse; people suffering from homelessness or the threat of homelessness; and people with an unsettled way of life		It is recognised that students in these situations may find it difficult to access online services to learn about the CoPA and to submit an appeal. It may also be difficult for students to attend face-to-face meetings with staff. Reasonable adjustments relating to these are set out in Sections 4 and 5 below.	No impact identified.

ESOL (English as a second or foreign language)		While the revised CoPA is written in clear, concise language, many of our students do not speak English as a first language and may feel daunted by the appeals process as a result. Reasonable adjustments relating to these are set out in Sections 4 and 5 below.	No impact identified.
Asylum Seekers	No impact identified.	Students claiming asylum may suffer from emotional distress, and/or mental or physical ill-health. Asylum seekers may also not speak English as a first language and may feel daunted by the appeals process as a result. Reasonable adjustments relating to these are set out in Sections 4 and 5 below.	No impact identified.
Addiction issues; low socio-economic status (SES); being a person with a conviction; being a young person leaving local authority care; being a kinship carer; being a lone parent; experiencing separation, relationship or family breakdown; having a responsibility as a main care giver; and leaving the armed forces	No impacts identified.	No specific impacts identified.	No impact identified.

4. How has the identified negative impact been mitigated? – please provide details of undertaken actions broken down by protected characteristic

4.1 Disability – It is recognised that some students may find it difficult to raise appeals relating in some way to this protected characteristic due to the sensitive information involved. Appeals cannot, by their nature, be taken forward anonymously. The CoPA (and associated guidance and documentation) does, however, incorporate a clear statement regarding confidentiality – ensuring that appellants know at the outset of the process how any sensitive data will be handled. It is recognised that students may face physical, sensory and communication barriers to raising appeals. To mitigate against this, the CoPA (and associated guidance and documentation) sets out the support GSA can provide (e.g. providing documentation in alternative formats; providing interpretation and/or translation services for British Sign Language users). The CoPA (and associated guidance and documentation) gives appellants the opportunity to identify specific disability-related reasonable adjustments where GSA can support them. GSA will also create a Quick Guide for appeals in Simple English, incorporating a flowchart (See **Section 5.3** below). The CoPA states explicitly that appellants may bring a supporter of their choice to any appeal hearings. The CoPA (and associated guidance and documentation) also state explicitly

that GSASA can provide support with appeals. Students with disabilities may also find it difficult to attend face-to-face meetings with staff. To mitigate against this, the CoPA states explicitly that all meetings and hearings relating to an appeal can be conducted remotely.

4.2 Gender reassignment – It is recognised that some students may find it difficult to raise appeals relating in some way to this protected characteristic due to the sensitive information involved. To mitigate against this, the CoPA (and associated guidance and documentation) incorporate a clear statement regarding confidentiality – ensuring that appellants know at the outset of the process how any sensitive data will be handled. The CoPA states explicitly that appellants may bring a supporter of their choice to any appeal hearings – and the CoPA (and associated guidance and documentation) state explicitly that GSASA can provide support with appeals.

4.3 Race – It is recognised that some students may be reticent in raising appeals due to reasons relating to cultural background. To mitigate against this, the CoPA states explicitly that appellants may bring a supporter of their choice to any appeal hearings – and the CoPA (and associated guidance and documentation) state explicitly that GSASA can provide support with appeals.

4.4 Sex – It is recognised that students may find it difficult to raise appeals relating to this protected characteristic, due to the potentially sensitive information involved. To mitigate against this, the CoPA (and associated guidance and documentation) incorporate a clear statement regarding confidentiality – ensuring that appellants know at the outset of the process how any sensitive data will be handled. The CoPA states explicitly that appellants may bring a supporter of their choice to any appeal hearings – and the CoPA (and associated guidance and documentation) state explicitly that GSASA can provide support with appeals.

4.5 Sexual orientation – It is recognised that some students may find it difficult to raise an appeal relating in some way to this protected characteristic due to the sensitive information involved. To mitigate against this, the CoPA (and associated guidance and documentation) incorporate a clear statement regarding confidentiality – ensuring that appellants know at the outset of the process how any sensitive data will be handled. The CoPA states explicitly that appellants may bring a supporter of their choice to any appeal hearings – and the CoPA (and associated guidance and documentation) state explicitly that GSASA can provide support with appeals.

4.6 Mental health – It is recognised that some students may find it difficult to raise an appeal relating in some way to this issue, and may require additional support. To mitigate against this, the CoPA (and associated guidance and documentation) incorporate a clear statement regarding confidentiality – ensuring that appellants know at the outset of the process how any sensitive data will be handled. The CoPA states explicitly that appellants may bring a supporter of their choice to any appeal hearings – and the CoPA (and associated guidance and documentation) state explicitly that GSASA can provide support with appeals.

4.7 Poor literacy or numeracy skills – The CoPA is set out in written form on the GSA website, and appeals are submitted via a web-based form. It is recognised that students with poor literacy may find it difficult or, be reluctant, to raise an appeal because of this. To mitigate against this, the CoPA (and associated guidance and documentation) sets out the support GSA can provide (e.g. providing documentation in alternative formats). GSA will also create a Quick Guide for appeals in Simple English, incorporating a flowchart (See **Section 5.3** below). The CoPA states explicitly that appellants may bring a supporter of their choice to any appeal hearings – and the CoPA (and associated guidance and documentation) state explicitly that GSASA can provide support with appeals.

4.8 Digital exclusion – It may be difficult for people with little or no access to online services and/or poor digital literacy to learn about the CoPA and submit an appeal. The GSA Digital Inclusion Scheme aims to mitigate lack of access to online services by offering students long-term loans of laptops. The CoPA (and associated guidance and documentation) also state explicitly that GSASA can provide support with appeals.

4.9 Chronic or terminal illnesses – It is recognised that appellants suffering from chronic or terminal illness may suffer from physical and/or emotional distress. To mitigate against this, the CoPA states explicitly that appellants may bring a supporter of their choice to any appeal hearings – and the CoPA (and associated guidance and documentation) state explicitly that GSASA can provide support with appeals. It is further recognised that appellants suffering from chronic or terminal illness may find it difficult to attend face-to-face meetings with staff. To mitigate against this, the CoPA states explicitly that all meetings and hearings relating to an appeal can be conducted remotely.

4.10 People fleeing domestic abuse; people suffering from homelessness or the threat of homelessness; and people with an unsettled way of life – It is recognised that students in these situations may find it difficult to access online services to learn about the CoPA and to submit an appeal. The GSA Digital Inclusion Scheme aims to mitigate lack of access to online services by offering students long-term loans of laptops. The CoPA (and associated guidance and documentation) further state explicitly that GSASA can provide support with appeals. It may also be difficult for students to attend face-to-face meetings with staff. To mitigate against this, the CoPA states explicitly that all meetings and hearings relating to an appeal can be conducted remotely.

4.11 ESOL – Many of our students do not speak English as a first language and may feel daunted by the appeals process as a result. The CoPA states explicitly that appellants may bring a supporter of their choice to any appeal hearings – and the CoPA (and associated guidance and documentation) state explicitly that GSASA can provide support with appeals. We will also create a Quick Guide for appeals in Simple English, incorporating a flowchart (See **Section 5.3** below).

4.12 Asylum Seekers – Students seeking asylum may suffer from emotional distress, and/or mental or physical ill-health. The CoPA states explicitly that appellants may bring a supporter of their choice to any appeal hearings – and the CoPA (and associated guidance and documentation) state explicitly that GSASA can provide support with appeals. Asylum seekers may also not speak English as a first language and may feel daunted by the appeals process as a result. GSA will create a Quick Guide for appeals in Simple English, incorporating a flowchart (See **Section 5.3** below).

5. Any outstanding mitigation (where applicable) – please provide a concise action plan with action owner and a timescale for completion

Action	Equality Impact	Person Responsible	Time frame
<p>5.1 Create Letter Templates for correspondence to appeals – ensuring acknowledgment templates incorporate a clear statement on confidentiality; set out the support GSA can provide (e.g. providing documentation in alternative formats) and give appellants the opportunity to identify specific disability-related reasonable adjustments where GSA can support</p>	<p>To mitigate against potential barriers relating to disability; gender re-assignment; race; sex; sexual orientation; mental health; poor literacy; digital exclusion; chronic or terminal illness; domestic abuse; homelessness; an unsettled way of life; and asylum seeker status.</p>	<p>Academic Quality Office</p>	<p>By September 2022 (prior to launch of revised CoPA)</p>

<p>them; and signpost to the GSASA for support.</p>			
<p>5.2 Revise Appeals Website & Intranet Pages – ensuring pages incorporate a clear statement on confidentiality; set out the support GSA can provide (e.g. providing documentation in alternative formats) and give appellants the opportunity to identify specific disability-related reasonable adjustments where GSA can support them; and signpost to the GSASA for support.</p>	<p>To mitigate against potential barriers relating to disability; gender re-assignment; race; sex; sexual orientation; mental health; poor literacy; digital exclusion; chronic or terminal illness; domestic abuse; homelessness; an unsettled way of life; and asylum seeker status.</p>	<p>Academic Quality Office</p>	<p>By September 2022 (prior to launch of revised CoPA)</p>
<p>5.3 Create a Quick Guide for appeals – written in Simple English, and incorporating a flowchart summarising the stages of the appeals process.</p>	<p>To mitigate against potential barriers relating to disability; poor literacy; ESOL; and asylum seeker status.</p>	<p>Academic Quality Office</p>	<p>By September 2022 (prior to launch of revised CoPA)</p>

6. How does the outcome of this assessment and the actions undertaken support GSA’s [2021 - 2025 Equality Outcomes](#)

6.1 Outcome 1 – Actively foster and support an organisational culture in which dignity and respect for self and others is understood and practiced, where confidence is encouraged and promoted, and where ignorance, prejudice and bias is challenged – The new CoPA establishes a clear, documented and transparent process which will empower all students to challenge academic decisions on assessment where necessary. It states explicitly that no student will suffer any detriment as a result of making an appeal. The confidentiality statement incorporated in the CoPA (see **Section 4**) and associated documentation (see **Section 5**) ensures that all students know at the outset of the process how their personal data will be processed, and that their confidentiality and privacy will be respected.

6.2 Outcome 2 - Continue to evaluate our physical and digital environment, aiming to optimise accessibility and inclusivity by acknowledging and providing for the needs of our students, staff and stakeholders – The actions outlined above aim to accommodate the diverse needs of our student body, with the aim of ensuring that all students can access the appeals process on an equal footing. The new CoPA and associated guidance and documentation also set out the range of options for reasonable adjustments and support available to students.

6.3 Outcome 3 - Actively build and support a staff population which is more reflective of the Scottish population and encourage a diverse student body – Not applicable to the current procedure.

6.4 Outcome 4 - Improve lifelong outcomes for students by identifying and supporting those groups facing persistent inequality throughout and beyond their student learning journey into positive destinations – By seeking to identify and mitigate against potential barriers faced by students from diverse backgrounds, the actions outlined in this assessment aim to ensure that all students are able to access the appeals process where necessary – thereby helping to improve their learning journey and their lifelong outcomes.

6.5 Outcome 5 - Develop a comprehensive and robust equality and diversity data set which enables us to identify gaps, inform action, assess progress and measure impact for each Equality Outcome – GSA collects and monitors data on appeals on an ongoing basis.

7. How does the outcome of this assessment and the actions undertaken support the three main duties GSA has under the Equality Act 2010 [Equality Act 2010](#) to:

- eliminate discrimination, harassment and victimisation;
- advance equality of opportunity;
- foster good relations between people who share a relevant protected characteristic and those who do not?

7.1 Eliminate discrimination, harassment and victimisation – The confidentiality statement incorporated in the CoPA (see **Section 4**) and associated documentation (see **Section 5**) will help ensure that all students feel empowered to raise appeals relating in some way to relevant, sensitive, protected characteristics as set out in the Equality Act 2010.

7.2 Advance equality of opportunity – Pro-actively signposting options for reasonable adjustments and support in the new CoPA (see **Section 4**) and associated documentation (see **Section 5**) will help ensure that all students can access the appeals process on an equal footing.

7.3 Foster good relations – Ensuring that there is a clear, transparent process by which to challenge academic decisions on assessments that can be accessed by all students will help to ensure that no student feels excluded – thereby fostering good relations between those who share relevant, protected characteristics and those who do not.

8. Where/when will action progress and outcome be reported and reviewed?

The actions set out in Section 5 will be reported to Janet Allison, Academic Registrar.

--

Next review date – please consider any outstanding actions outlined above; the review period must be in line with the policy/service review and/or at intervals of no more than three years	2025
--	------

Signed off by Owner/Review Lead (Fergus Mason, Policy Officer)	(19.05.2022)
Signed off by Executive Lead (Allan Atlee, Deputy Director Academic)	(19.05.2022)
Signed off by Equality Lead (Svetoslava Sergieva, Equality Officer)	(19.05.2022)