

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)	Support to Study Policy and Procedure
New or reviewed	New
Owner/Review Lead and role	Julie Grant – Head of Student Support and Development - ju.grant@gsa.ac.uk
Department or School	Student Support and Development
Date of assessment	May 2022

1. Purpose of policy / practice / procedure / project being assessed – brief description

This policy outlines how concerns about a student's health and wellbeing may be raised and managed, with support offered to the student. At GSA we aim to work with and support students in a collaborative manner including students who have a temporary or long-term physical or mental health condition which may have an adverse impact on their ability to study. Whilst students are responsible for the management of their own health and wellbeing, GSA recognise that at times, students may face personal challenges which may impact on their ability to fully participate in their learning. This Support to Study Policy and Procedure seeks to ensure that all students have the opportunity to fully participate in student life, and to study and achieve in a safe and supportive environment.

The procedure is intended to balance the needs of students whilst recognising the impact behaviours have on fellow students and staff, and the boundaries of the level of support the School can be expected to provide.

The purpose of the policy is to ensure that there is a fair, transparent and consistent process in place for students and staff. This policy only applies if there is significant concern for a student's wellbeing and they are considered a risk to themselves or others. GSA will focus on early intervention strategies and a variety of support (as referenced in the policy and procedure) will be offered before instigating this policy. A Support to Study Policy was considered in preference to a Fitness to Study Policy as it is considered to be more inclusive and is reflective across the sector.

These policy and procedure aim to support mainstreaming of equality. Due regard has been given to PSED throughout the development of the policy with particular reference to ensuring that students are not discriminated against as a consequence of disability (identified as a long term physical or mental health condition) and that a framework for the consideration and support of individual need is consistently implemented therefore contributing to good relations. Consideration has been given to the impact of intersectionality across all protected characteristics.

The policy and procedure:

- Defines the responsibilities of the student and of GSA
- Removes barriers to learning and promotes a positive approach towards students with physical or mental health difficulties
- Puts in place a process for student centred consideration of individual need and an expectation that reasonable needs are met to support the student to return to the learning and teaching environment (preventing discrimination and advancing equality)
- Provides a suitable, coordinated and equitable approach which is not disciplinary in nature
- Advocates a collaborative and flexible approach to emergent need with regular review to ensure responsiveness
- Creates a safe space for students in which to study

2. Evidence used when undertaking this assessment – this can comprise of internal and external reports, survey data, etc

The policy is aligned with sector guidance and regulatory requirements and formalises practice at GSA to date. The policy and guidance were benchmarked against a number of HEI's including University of Glasgow, University of Stirling and Glasgow Caledonian University. A variety of research and guidance was considered as part of this process including:

- The UK Equality Act 2010
- Universities UK Stepchange: Mentally Healthy Universities and Universities Suicide Safer guidance.
- Student Minds University Mental Health Charter (2019)
- UK Healthy Working Lives Scotland
- LGBT Youth Scotland Report Life in Scotland for LGBT Young People (2017)
- Equality and Human Rights Commission Report Tackling Racial Harassment: Universities Challenged (2019)
- Improving Mental Health and Wellbeing Support for Scotland, Oct 2020
- Mental health in Scotland 10 year vision - NUS Scotland response

Additional evidence included:

- GSA equality statistics available in the [equality section of GSA's website](#)
- GSA [Completed Equality Impact Assessments – Examples \(gsa.ac.uk\)](#)
- According to a recent independent report from the Heads of University Counselling Services Scotland (HUCSS); [University Counselling Services in Scotland: Challenges and Perspectives](#), the GSA have one of the highest proportion of students requesting counselling support.

Mental Health has been raised as a concern by students and staff through a variety of forums; Student and staff Equality Outcomes consultation meetings, Boards of Study, Student Staff consultative Committees, Programme Monitoring and Annual Reviews and the EDI Committee.

This approach is supported by the [Universities UK Stepchange: Mentally Healthy Universities](#) and UK [Healthy Working Lives Scotland](#) framework.

As this is a new policy, there is no data available in relation to the number of students involved in the process or the impact of the policy and procedure. This will be collated yearly once the policy and process and has been approved and implemented. Nevertheless, the following available data has been used:

The severity rating of students accessing the counselling service has remained fairly consistent, however, the implementation of a Mental Health Advisor in 2019 and associated data collected evidences a growing number of students assessed with a severity rating level 5 or above; 20% - 40% of students. GSA have over 30 students each year whose difficulties have been categorised as experiencing severe anxiety and distress affecting all areas of functioning to not coping; out of control; despair and hopelessness; emotionally overwhelmed; suicidal thoughts/intent.

Counselling Service Severity Ratings

	1	2	3	4	5	6	7	Totals
2015/16	1 (0.4%)	3 (1.3%)	42 (17.5%)	151 (62.9%)	38 (15.8%)	3 (1.3%)	2 (0.8%)	240
2016/17	1 (0.4%)	4(1.5%)	66 (25.2%)	169 (64.5%)	19 (7.2%)	1 (0.4%)	2 (0.8%)	262
2017/18	1 (0.4%)	3 (1.1%)	77 (28.2%)	167 (61.2%)	20 (7.3%)	0	5 (1.8%)	273
2018/19	0	3 (1.0%)	76 (24.4%)	204 (65.4%)	26 (8.3%)	1 (0.3%)	2 (0.6%)	312
2019/20	0	4 (1.2%)	96 (29.3%)	207 (63.1%)	16 (4.9%)	1 (0.3%)	4 (1.2%)	328
2020/21	38 (12.2%)	9 (2.9%)	70 (22.6%)	180 (58.1%)	9 (2.9%)	1 (0.3%)	3 (1.0%)	310
2021/22	10 (2.5%)	1 (0.3%)	125 (32%)	243 (62%)	9 (2.3%)	2 (0.5%)	1 (0.3%)	391

Counselling Service Severity Rating level 5 and above

	No. of students	% of students seen
2017/18	25	9.2%
2018/19	29	9.3%

2019/20	21	6.4%
2020/21	13	4.2%
2021/22	12	3.1%

Mental Health Advisor Severity Ratings

	1	2	3	4	5	6	7	Total
2019/20	-	-	5 (6.0%)	46 (55.4%)	20 (24.1%)	4 (4.8%)	8 (9.6%)	83
2020/21	-	-	6 (5.1%)	74 (63.2%)	24 (20.5%)	4 (3.4%)	9 (7.7%)	118
2021/22	2 (1.3%)	2 (1.3%)	9 (5.8%)	106 (68.4%)	31 (20.0%)	2 (1.3%)	3 (1.9%)	155

Mental health Advisor Severity Rating level 5 and above

	No. of students	% of students assessed
2019/20	32	38.6%
2020/21	37	31.6%
2021/22	36	23.2%

Intersectionality has also been considered noting trends and any potential gaps in access.

Counselling Service

	Sex/Gender			Ethnicity			Disability	
	Male	Female	Other	White	Minority Ethnic Background	Unknown	Disability	No known disability
2019/20	23%	77%	-	63%	32%	4%	51%	49%
2020/21	19%	81%	-	72%	24%	4%	47.5%	52.5%
2021/22	24%	76%	-	74%	22%	4%	36%	64%

- **Sex:** There is an increase in the percentage of male students accessing the service (24%), although still not representative of the overall GSA population which was 30% in 21/22, this is a positive step. It should also be noted that across the sector, fewer male than female students are reported to access services and our figures reflect positively when benchmarking.
- **Age:** No identified trends related to age profile.
- **Sexual Orientation:** A higher percentage of students (in comparison to GSA data) who identify as bisexual are accessing groupwork sessions; 19% in 2019/20 and 20% in 20/21. Three counsellors have completed Gendered Intelligence Training with yearly supervision maintained to ensure continued registration.
- **Religious Description:** No significant trends are identifiable.

- **Ethnic Description:** There is a small decrease in the percentage of students who come from a minority ethnic background, however, there are many cultural barriers and often stigma related to accessing this type of service with students anecdotally reporting concern that this information would be shared more widely. Counselling is a confidential service and we need to continue to reinforce this message.
- **Disability Description:** There are a significantly higher percentage of students disclosing a disability accessing group support.
- There was no data available for Transgender students.

Mental Health Service

	Sex/Gender			Ethnicity			Disability	
	Male	Female	Other	White	Minority Ethnic Background	Unknown	Disability	No known disability
2019/20	23%	77%	-	63%	32%	5%	48%	52%
2020/21	19%	81%	-	72%	24%	4%	50%	50%
2021/22	26%	74%	-	73%	23%	4%	45%	46%

- **Ethnic Description:** A higher percentage of White students accessed individual support than the GSA overall average. There is a small decrease in the percentage of students from a minority ethnic background accessing the service, however, there are many cultural barriers and often stigma related to accessing this type of service with students anecdotally reporting concern that this information would be shared more widely. Counselling is a confidential service and we need to continue to reinforce this message
- **Sex:** There are a higher percentage of female students accessing the service potentially indicating additional barriers for male students which is in line with sector and national evidence, however, the percentage of male students accessing the service has increased significantly over the past year evidencing improvement.
- **Age:** The data is reflective of the overall GSA population with 35% of students within the 22-24 category, 29% within the 25-39 and 20% within 19-20.
- **Sexual Orientation:** On average, 20% of students accessing individual mental health support identified as Bisexual. This is significantly higher than the institutional data which is approx. 10%.
- **Religious Description:** 70% of students accessing individual mental health support indicated no religion.
- **Disability Description:** There is a higher percentage of students disclosing a disability accessing the Mental Health Service; 50% in 2020/21 and 45% in 2021/22.
- There was no data available for **Transgender** students.

This data demonstrates the need to support students and staff and continue to develop awareness, process and procedures to support this growing area of need.

Finally, the policy and procedure have been designed through co-production with students and staff, delivered according to need of the institution. The process involved Student Support and Development with specific input from mental health staff with appropriate knowledge and expertise, the Health and Safety Manager, Registry, the Deputy Director Academic and Policy and Governance.

Student consultation involved a small cohort of students with specific experience of mental health difficulties, as well as members of the GSA Students Association. A Draft Support to Study Policy and Procedure and EqIA was supported at the EDI Committee in September 2022 and submitted to each Board of Study in October 2022 with a second opportunity to provide feedback in February 2023.

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 specific impact identified.
Disability	Positive impact	Negative impact	Neutral impact
	<p>It is acknowledged that this policy is likely to have the greatest impact on students with a recognised disability as it relates to health and wellbeing.</p> <p>There is potential for positive impact in relation to the removal of the stigma of mental health problems and in addressing and supporting students in distress or crisis in a compassionate and caring manner with the ability to address risk if required.</p>	<p>It is acknowledged that this policy is likely to have the greatest impact on students with a recognised disability as it relates to health and wellbeing.</p> <p>Students with a disability including mental health may feel at a disadvantage however, it is vital the GSA manage the level of risk to students and staff with student wellbeing and safety as a key priority</p> <p>This has been considered and the procedure is clear that all other supportive measures should be considered before instigating this policy and procedure in a compassionate and caring manner with the ability to address risk if required.</p>	
Gender reassignment (covers Trans identities)	Positive impact	Negative impact	Neutral impact
	<p>It is acknowledged that although this policy is not anticipated to have any direct impact on gender reassignment, national data (see Section 2) suggests that young people in education can still face harassment, bullying and discrimination on the grounds of gender identity and are more likely to experience mental health difficulties. Therefore, the point made in ‘Disability’ above – around removal of mental health stigma applies to ‘Gender reassignment’ as well.</p> <p>There is potential for positive impact in relation to the removal of the stigma of mental health problems</p>	<p>It is acknowledged that although this policy is not anticipated to have any direct impact on gender reassignment, national data (see Section 2) suggests that young people in education can still face harassment, bullying and discrimination on the grounds of gender identity and are more likely to experience mental health difficulties.</p> <p>GSA commits to ensuring that staff involved in this process have an awareness of additional barriers faced.</p>	

	which can be exacerbated by gender reassignment, and in addressing and supporting students in distress or crisis in a compassionate and caring manner with the ability to address risk if required.		
Marriage and Civil Partnership	Positive impact	Negative impact	Neutral impact
			No specific impact identified.
Pregnancy and Maternity	Positive impact	Negative impact	Neutral impact
	Potential positive impact on pregnancy and maternity-related mental health issues/conditions		There is no specific impact identified however, if a student, staff member or other involved party are on leave due to Pregnancy and Maternity while the process is being implemented, reasonable adjustments can be made in terms of timescale and flexibility.
Race	Positive impact	Negative impact	Neutral impact
	<p>Similar to 'Disability' and 'Gender reassignment' above, there is a potential for positive impact for students experiencing mental health problems associated with race.</p> <p>There is potential for positive impact in relation to the removal of the stigma of mental health problems with consideration of cultural and language barriers, and in addressing and supporting students in distress or crisis in a compassionate and caring manner with the ability to address risk if required.</p>	<p>Sector-wide evidence relating to race equality (see Section 2) identifies that on a UK-wide basis, students from minority ethnic backgrounds may be more likely to be subjected to bullying/harassment or discrimination and can be more likely to experience mental health difficulties. Students who have limited English or English as an additional language may require additional support to understand the process and procedure.</p> <p>Internally, there is a small decrease in the percentage of students accessing mental health/counselling services who come from a</p>	

		<p>minority ethnic background, however, there are many cultural barriers and often stigma related to accessing this type of service with students anecdotally reporting concern that this information would be shared more widely.</p> <p>Counselling is a confidential service and we need to continue to reinforce this message.</p> <p>GSA commits to ensuring that staff involved in this process have an awareness of additional barriers faced and a degree of cultural competency.</p>	
Religion or Belief	Positive impact	Negative impact	Neutral impact
	<p>Similar to 'Disability', 'Gender reassignment' and 'Race' above, there is a potential for positive impact for students experiencing mental health problems associated with religion and belief.</p> <p>There is potential for positive impact in relation to the removal of the stigma of mental health problems and in addressing and supporting students in distress or crisis in a compassionate and caring manner with the ability to address risk if required.</p> <p>GSA commits to ensuring that staff involved in this process have an awareness of additional barriers faced and a degree of cultural competency.</p>	<p>There is sector evidence to suggest that culture (see Section 2) can have a significant impact on understanding of, and accessing mental health services. During religious festivals there may be some difficulty for students and staff in adhering to the timescales set out in the procedure however there is a degree of flexibility regarding timescales and reasonable adjustment will be made where possible.</p> <p>GSA commits to ensuring that staff involved in this process have an awareness of additional barriers faced and a degree of cultural competency</p>	
Sex	Positive impact	Negative impact	Neutral impact
			<p>No specific impact identified however, there is evidence to suggest that students identifying as male are less likely to access services. Consideration will be given to this and</p>

			services will be promoted and targeted where possible.
Sexual orientation	Positive impact	Negative impact	Neutral impact
	<p>Similar to 'Gender reassignment', there is a potential for positive impact on students with mental health issues relating to their sexual orientation, coming out, etc.</p> <p>GSA have a higher percentage of students accessing mental health services who identify as bisexual.</p> <p>Three counsellors have completed Gendered Intelligence Training with yearly supervision maintained to ensure continued registration.</p> <p>GSA commits to ensuring that staff involved in this process have an awareness of additional barriers faced.</p>		
Impact on other groups (e.g. Care Experienced; Carers; Military Veterans; Low Socioeconomic Status (SES); Asylum Seekers; British Sign Language Users, etc)	Positive impact	Negative impact	Neutral impact
	<p>Similar to a few of the categories above, there is a potential for positive impact on students with mental health issues relating to being care experienced, having care responsibilities or coming from asylum seeking or low SES backgrounds.</p> <p>GSA commits to ensuring that staff involved in this process have an awareness of additional barriers faced.</p>		
4. How has the identified negative impact been mitigated? – please provide details of undertaken actions broken down by protected characteristic			
<p>Any potential negative impact identified has been addressed in section 5.</p> <p>It should be recognised that staff may find supporting students with complex issues difficult or potentially triggering. This has been considered and there are strategies in place such as the Employee Assistance Programme which includes for offer of counselling for staff.</p>			

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
GSA will ensure all other support strategies have been exhausted before this policy is implemented.	This will support students and staff to ensure appropriate support is in place as soon as a concern is raised.	Head of School and Head of SSD	Ongoing
GSA commit to ensuring that staff involved in this process have an awareness of additional barriers faced by students undergoing gender reassignment.	Develop an understanding of intersectionality and the impact this may have.	Head of SSD/EDI Officer/Director of HR	September 2022
Students who have limited English or English as an additional language may require additional support to understand the process and procedure.	Support will be offered at all stages to ensure understanding and removal of any potential barrier.	Head of SSD/EDI Officer	Ongoing
GSA commit to ensuring that staff involved in this process have a degree of cultural competency in relation to race, religion and belief.	Staff involved in the process will have a degree of cultural competency in relation to race, religion and belief	Director of HR	September 2022
Monitor and record staff completion rates of relevant e-learning modules i.e. Insiders and Outsiders, Unconscious Bias, Identifying and responding to Student Mental Health, Neurodiversity, Safeguarding and Equality and Diversity	Staff involved in the process will have a degree of cultural competency, EDI awareness, mental health awareness and an understanding of barriers students may face	Director of HR	September 2023
Students may not wish to or be able to attend face-to-face meetings, and that adjustments should be made accordingly (e.g. telephone/zoom meetings).	Increase accessibility and remove barrier to potential non-attendance	All staff	Ongoing

Explore ways of promoting the policy and procedure	Ensure all students are aware of the support available. Support Services are available, accessible and appropriate for all students and throughout the academic year	Head of Student Support and Development	September 2023
Collect yearly data on how often the procedure is required to be implemented	Evaluate impact and ensure policy is used in a supportive manner; (safe and effective interventions that are regularly audited for safety, quality and effectiveness). Request and collate feedback from students and staff involved in the process	Head of Student Support and Development	July 2024
Develop a Student Mental Health Agreement and Suicide Safer Strategy	Support all those affected by suicide and plan for prevention, intervention and postvention activities and ensure that support services for mental health are safe and effective.	Head of SSD	September 2023
Work in partnership with local NHS and care services with effective working relationships and information sharing agreements in place	Student are supported holistically with long term strategies in place externally.	Mental Health Advisor	Ongoing

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

It is anticipated that GSA's approach to supporting students to Support to Study will contribute to the further development of inclusive learning and teaching practice for all. Additionally, the Student Support department will support staff capability (to recognise where and when the Support to Study Policy is applicable and how to implement it), ensuring consistency of implementation across the GSA in response to individual need. The policy and procedure will also support early intervention and partnership work to identify students that may benefit from accessing additional support. Finally, throughout the support to study process, reasonable adjustments will be made to meet individual needs, and support will be provided to registrants, including signposting to support agencies.

All of the above supports GSA's EQUALITY 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.* As part of this outcome, GSA commit to reviewing

the Health and Wellbeing provision for students and staff in line with UK [Healthy Working Lives Scotland](#), [Universities UK Stepchange: Mentally Healthy Universities Framework](#) and [Universities Suicide Safer](#) guidance.

This Support to Study Policy and Procedure seeks to ensure that all students have the opportunity to fully participate in student life, and to study and achieve in a safe and supportive environment.

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?**

At all stages of the policy, every effort was made to address concerns with the **full and informed agreement** of the student (where possible) therefore fostering good relations.

This policy will provide an alternative, supportive option other than disciplinary procedures where student conduct is as a result of a mental health condition therefore advancing equality of opportunity.

The policy has the potential to have a positive impact for students who are unable to make their own decisions with regards to taking time away from their studies during or following a period of experiencing personal challenges with their health/poor mental health. This helps eliminate unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Equality Act 2010, that these students could have been subjected to should there have been no policy in place.

Processes are clear and transparent and students will be informed in advance to meet the needs and ensure equality of opportunity for people from different groups.

Students and staff will be more informed of the support available and GSA's approach to student mental health. Staff are supported with a formal way of raising and addressing concerns relating to individual students and their health therefore fostering good relations, tackling prejudice and promoting understanding.

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

Implementation will be monitored and the policy reviewed on a three-yearly cycle with earlier review where evidence suggests that this is necessary or where the regulatory framework changes.

The impact of the policy and procedure will be measured by review of the number of times it is invoked, the actions taken in response and any concerns raised or complaints received. It will be reviewed annually. In monitoring the impact of this procedure, GSA will have due regard to the specific and general Equality Duties.

Student complaints and academic appeals arising in relation to the implementation of this policy will be reported through the academic committee structure and any quality enhancement issues arising, addressed.

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	May 2026
--	----------

Signed off by Owner/Review Lead Julie Grant – Head of Student Support and Development	March 2023
Signed off by Executive Lead Alan Atlee – Deputy Director Academic	December 2022
Signed off by Equality Lead Svetoslava Sergieva – Equality Officer	March 2023
Signed off by Education Committee	(date)