

INCLUSION  
365



**EQUALITY IMPACT ASSESSMENT  
REPORT**

**University of Brighton**

Proposal for co-location of certain academic  
schools to Brighton

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## Executive Summary

The University of Brighton has put in place a strategy 'Delivering Practical Wisdom' Brighton 2025. This sets out how the University can work towards becoming net zero, modern, accessible, economically viable and provide the best possible learning environment for its students. It has identified that the way forward in realising these ambitions is to relocate the School of Sport and Health Sciences from Eastbourne to Falmer, and the School of Humanities and Social Science from Falmer and City to Moulsecoomb, and to close the University's Eastbourne campus.

This report looks at the equality implications of this decision, it particularly focuses on the move from Eastbourne as this has more equality dimensions and therefore gives the diversity profile for this part of the University. The report outlines the many positive benefits:

- The refurbishment will be designed for accessibility including taking into account the needs of neurodiverse students.
- Overall, there will be a considerable improvement in accessibility by moving from Victorian period, inaccessible buildings in Eastbourne to a modern campus that takes account of inclusive design.
- Both LGBTQ+, ethnic minorities and faith communities will be part of much larger communities in Brighton.

There will also be some equality challenges:

- Carers living in Eastbourne may find it harder to maintain their role and caring responsibilities with the extra commute to Brighton.
- The station at Moulsecoomb is not accessible and the Falmer campus is on a slope so it may be difficult for people with mobility impairments.
- Some areas of Brighton can be quite expensive.

Where possible, the University needs to take action to mitigate these disadvantages: by putting the right policies in place and making sure they are well known and encouraging their use.

**a) Summary of issues by protected characteristic**

<b>Protected Characteristic</b>	<b>Issue identified</b>	<b>Mitigating Action</b>
<b>Age</b>	<p>Carers may find the move from Eastbourne to Brighton challenging.</p> <p>Some roles that have the specific purpose of supporting the Eastbourne campus may be at risk. A number of staff in those roles are long serving and/or in the upper age bracket.</p>	<p>Provide support available in line with the Policy on Supporting Staff who have Caring Responsibilities. This may include, for example, flexible working. Advertise other support available e.g. the Excess Travel Scheme.</p> <p>Career support including options for redeployment.</p>
<b>Gender</b>	<p>No issue for students. More women than men likely to be carers so similar to Age.</p>	<p>Provide support available in line with the Policy on Supporting Staff who have Caring Responsibilities. This may include, for example, flexible working. Advertise other support available e.g. the Excess Travel Scheme.</p> <p>Career support including options for redeployment.</p> <p>In the event that roles are at risk, conduct a further EIA on the equality impacts.</p>
<b>Disability</b>	<p>Many positive benefits: the refurbishment will take into account neurodiverse needs and will be much more accessible than the Eastbourne buildings.</p> <p>Some challenges e.g. Falmer being on a slope, inaccessible train station at Moulsecoomb e.g. lack of complete step free access.</p>	<p>Ensure that there are sufficient and free disabled parking spaces on campus.</p> <p>Put in place guidance for people with physical, sensory and mental impairments on how to navigate the campus.</p> <p>Ensure the redesign and refurbishment of buildings conform to Inclusive Design standards.</p>

		<p>Continue to work with Network Rail and other relevant stakeholders to make Moulsecoomb station more accessible.</p> <p>Ensure Learning Support Plans provide guidance on accessing the Brighton campuses.</p> <p>Ensure new accommodation has sufficient accessible rooms.</p> <p>Ensure that Access to Work is well publicised.</p>
<b>Gender Re-assignment</b>	Positive benefit: trans students and staff will be joining a larger community.	
<b>Marriage and civil partnership</b>	No issues identified.	
<b>Pregnancy and maternity</b>	<p>No issue identified for students other than the importance of ensuring that the GP service in Brighton has the capacity to manage the greater number of students.</p> <p>For staff, ensure that those on maternity leave are treated equally.</p>	<p>The University to work with the CCG to ensure that there is sufficient GP capacity to cope with the greater number of students in Brighton.</p> <p>Ensure excellent communications to staff on maternity leave and equality of treatment. In the event that roles are at risk, ensure adherence to the provisions of the Maternity and Parental leave etc Regulations (1999).</p>
<b>Race</b>	<p>Some positive benefits: ethnic minority students and staff based in Eastbourne will be joining larger communities. For some the journey will be better.</p> <p>Some challenges: in some areas, it is more expensive to rent in Brighton, for some the journey may be longer and more difficult.</p>	<p>All first years will be offered accommodation by the University.</p> <p>Publicise and encourage take up of the support available e.g. hardship grants.</p> <p>Support students in finding reasonably priced accommodation in Brighton.</p>

		Ensure that Staff and Student networks can make the most of the refurbishment and new facilities.
<b>Religion or Belief</b>	Positive benefits: staff and students who belong to different faiths will have more access to faith leaders and to wider communities with the co-location.	Ensure that faith needs are taken into consideration with the design of the refurbishment and development of facilities.
<b>Sexual orientation</b>	Positive benefit: LGBTQ+ staff and students will be part of a wider community.	

## Background and Purpose

### a) Background to the project

The University of Brighton has invited Inclusion 365 to conduct an Equality Impact Assessment (EIA) on the following proposal:

To bring together the new School of Humanities and Social Science in Mithras House on the redeveloped Moulsecoomb campus, co-locating it from its current sites at the Falmer and City Campus by the start of the 2023/24 academic year.

To consolidate the new School of Sport and Health Sciences on our Falmer campus, moving the provision currently based at Eastbourne to Falmer by the start of 2024/25 academic year. This will be enabled by the buying back of the long lease for the site currently occupied by Virgin Active and the redesign of the facilities.

To consolidate the University's provision on 3 campuses in Brighton, leading to the closure of the campus in Eastbourne and the Leaf Hospital (a specialist private podiatry and physiotherapy clinic in Eastbourne) from the start of the academic year, 2024-25.

All of this work is designed to help deliver on the following 4 strategic objectives:

- a. To deliver on our academic vision by co-locating our academic schools on single campuses.
- b. To create facilities for student learning and for staff which reflect the ambitions of a modern University.
- c. To create dynamic and accessible campuses that support our goal of becoming a net-zero carbon University.
- d. To create an affordable estate for the long term.

The EIA fulfils the University's legal obligations under the Equality Act 2010 to consider the equality implications of major policy decisions before making a decision. This report is written to inform the deliberations of the Board meeting in January 2022 when a final decision will be made.

This report was written by Inclusion 365, a specialist diversity consultancy. It works across the range of EDI work: Training, Audits and Equality Impact Assessments (EIA).

### Methodology

The EIA has been conducted through:

- Analysis of the different diversity documents and statistics that University of Brighton produces including the recently conducted public consultation.
- One to one conversations with a range of staff at University of Brighton.
- Comparison of demographic data for Brighton and Eastbourne.
- A literature review to highlight learning from other institutions.

## Introduction

The report first looks at the move as whole, it then analyses equality implications using the 9 different protected characteristics set out in the Equality Act 2010. It sets out the key findings under each of the 9, followed by analysis and then key recommendations for each section. These are summarised in the chart on pages 4 to 6.

### b) Key Findings

- There are many positive impacts: safeguarding the future of the University, a greater degree of collaboration, students and staff being part of larger communities.
- The diverse needs of staff and students need to be at the heart of the construction, renovation of buildings and creation of new facilities.
- The process of co-location needs attention as well as the final outcome.

There are many positive equality impacts from the proposed move. The public consultation highlights that some respondents had said bringing schools on to a single campus and allowing facilities to be improved would safeguard and improve the University for the future, facilitate the development of an identity on the Falmer campus, and would enable the University *'to be a world class centre for sport and health sciences'* and thus attract more students. Being in a sound financial position and attracting more students clearly benefits all protected groups. Respondents felt that co-location would lead to a greater degree of diversity and inclusivity.

The literature review highlights a key document which sets out a checklist for ensuring that new and refurbished buildings in higher education adhere to the principles of inclusive design. It sets out best practice for all institutes. The University should find it a very helpful reference point in realising its ambition of accessible campuses. There are many examples today even in new buildings of accessibility needs not being taken into account.

The report concentrates on the impact of co-location but the University also needs to pay attention to the transition itself. The literature review cites Southwark Council's EIA for the Aylesbury Estate which highlighted that disabled people may need extra support during the transition, particularly those with eyesight and mobility difficulties. It also cites a housing association's decant policy which says that there should be a clear point of contact to help residents understand the implications of the move and how they need to prepare. The University may be able to mitigate some of the challenges of the move through putting in place similar measures.

### Recommendations:

- Put in place plans that address communication and support needs during the transition.
- Consult with staff and student representatives on the refurbishment and the development of new facilities of the campuses.
- Incorporate Inclusive Design standards in the commissioning of the work.



### c) Impact Analysis by protected characteristic

#### Age

Key findings:

- The continuation rate for mature students is lower than for others.
- There are a higher proportion of mature students in Eastbourne.
- The extra commute for staff from Eastbourne to Brighton may make it more difficult for some carers to manage both their caring and work responsibilities.
- Some roles may be at risk (e.g. roles that have the specific purpose of supporting the Eastbourne campus). These roles include some older staff.

#### Students

The student statistics show that just over half the student population is under 21. Mature students make up 23% of full-time under-graduate students.<sup>1</sup> The report highlights that the continuation rate for part-time mature students is lower than for younger part-time students:

*‘the continuation rate of part-time mature students was significantly lower than that of young students in each year of the analysis. In the most recent year 74% of mature students continued, compared to 92% of young students’.*

For some of these students, the move to Moulsecoomb and Falmer may make the journey easier and potentially, this may make it more likely that they will continue with their studies.

The public consultation also notes that respondents felt that many of the students currently at Eastbourne are mature students and have family commitments with future commuting (time and costs) to Brighton having potential impacts on existing childcare and schooling arrangements. The University has set out that it will look at sympathetic timetabling to assist with this and as the actual move will not take place until 2023/4, many students may have finished their course in time. The University will still want to make sure its offering attracts mature students, but the time period will allow students to make plans before starting new courses.

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<sup>1</sup> University of Brighton Access and Participation Plan 2020-21, p.6 [link](#)

*Staff*

The staff monitoring data shows that the largest cohort of staff is between 40 and 60 years old:

Age	20-29	30-39	40-49	50-59	60-69	70-79
Staff at Eastbourne	3.3%	15.9%%	28.3%	37.7%	13.1%	1.6 %

Nationally, 1 in 7 of the workforce are carers<sup>2</sup> so we can assume the same pattern for the University’s workforce.

During the qualitative interviews, we were informed that many people working in Eastbourne had developed lives around the University and their caring responsibilities. The extra commute to Brighton may make these responsibilities much more difficult to carry out. The literature review highlights how HMRC have approached similar difficulty: they offer more flexible working options. The University of Brighton does have in place a ‘Policy on Supporting Staff who have Caring Responsibilities’ and it is important that this is well known.

The public consultation notes that the University has the following mitigating actions in place: The University’s Agile Working Framework allows for staff to work a hybrid model (timetabling permitting) and supports staff who incur significant travel expenses because their workplace has been changed (the Excess Travel Scheme).

The University is seen as one of the best employers in Eastbourne, offering good pension options and holidays and it has not outsourced management of its estate. This means that it is quite likely that a high proportion of staff at the Eastbourne campus have long service, including those in roles with the specific purpose of supporting the campus. The roles are more likely to be at risk. In order to mitigate this equality impact, the University will need to offer comprehensive career support. The literature review cites advice on best equality practice in redundancies from ACAS and the EHRC and a case study from the London Probation Office of how being proactive in career support led to a material difference in diversity outcomes.

**Recommendations:**

- Provide support available in line with the Policy on Supporting Staff who have caring responsibilities. This may include, for example, flexible working. Advertise other support available e.g. the Excess Travel Scheme.
- Ensure that that if roles are at risk, best equalities practice is followed, including undertaking a further EIA and that excellent career support is provided including options for redeployment.

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<sup>2</sup> Carers UK, Facts and figures: [link](#)

## Gender

Key finding:

- The key equality issues are the same as for age. The possibility of impact on long serving staff where roles may be at risk and the challenge of the longer commute for carers living in Eastbourne.

### *Students*

61.9% of students identify as female and 38% as male. No issues are identified for female or male students.

### *Staff*

Overall representation rates of men and women at the University are similar to UK sector averages (54.6% female and 55.4% male).

School	Female	Male
Eastbourne staff	62.1%	37.9%

The above table shows that there is a much higher proportion of female staff working in Eastbourne.

The issues identified in the age section also apply to gender. Women are more likely to be carers or single full-time parents than men. Carers UK sets out that the proportion is 58% of carers are women and 42% of men.<sup>3</sup>

According to GingerBread, leading national charity supporting single parents, 90% of single parents are women.<sup>4</sup>

Carers and parents may need extra support around the move which can include flexible hours, homeworking where possible and other support.

### **Recommendations:**

- Excellent career support for people in roles which may be at risk including the option of redeployment.
- Provide support available in line with the Policy on Supporting Staff who have Caring Responsibilities. This may include, for example, flexible working. Advertise other support available e.g. the Excess Travel Scheme.
- In the event that roles are at risk, conduct a further EIA on the equality impacts.

<sup>3</sup> Carers UK, Facts about Carers, Policy Briefing, August 2019

<sup>4</sup> Gingerbread, Single parents: facts and figures [link](#)

## **Disability**

### Key Findings:

- Disabled student outcomes are not as good as the majority.
- The move has advantages for disabled staff and students: a more accessible campus designed with different needs in mind.
- The supply of one-to-one support in Eastbourne may be difficult to replicate in Brighton.
- Moulsecoomb station is not fully accessible i.e. no complete step free access.

### *Students*

Overall, the University of Brighton has a significant number of disabled students, 22.1% of students have a declared disability. The Access and Participation plan shows that outcome for disabled students is not as good as the majority: students with a disability had a lower continuation rate in four of the five years. In the most recent year covered by the report, 60% of students with a disability progressed to work or further study.

There will be much that is positive in the move for disabled students and it could well have a positive impact on outcomes for disabled students. Eastbourne campus is not accessible for students who need a lift. Lifts are antiquated with parts needing to be ordered so students with a mobility impairment cannot access classes on the first and second floor. The station at Eastbourne is 2 miles from the campus. In particular, Pavilion Parade in Eastbourne was referred to in the consultation as one of the very worst buildings in terms of accessibility so relinquishing it will significantly improve the experience of disabled staff and students.

The refurbishment and development of new facilities takes into account neurodiversity and looks to support mental health. We were told that the design for the school at Moulsecoomb has foregrounded the student journey, prioritising an environment that is welcoming for staff and students. The design has meant creating specific offices for staff so that students can easily reach them rather than hotdesking. It has built in a diversity of spaces that students can find different spaces to suit them e.g. nooks and crannies for neurodiverse people who cannot have sensory overload and then bigger/wow environments that promote collaborative learning.

The refurbishment will include accommodation for all first-year students. It is essential that there are enough accessible rooms, and the University should consider offering accessible accommodation for disabled students for their entire degree. The literature review (page 20) notes that under the Equality Act 2010, universities are legally obliged to provide accessible accommodation.

Although accessibility is vastly improved by the move to Brighton, there are still challenges for students with mobility impairments. Moulsecoomb station is not accessible, and it has a flight of steep steps. Due to the topology of Falmer campus i.e. being on a slope, this may make it difficult for wheelchair users. The University will need to ensure that they offer guidance for students and staff with mobility impairments, physical, visual, hearing, and mental impairments on how to best manage these constraints. It needs to ensure the placing of clear, well positioned, and accessible signage that adheres to Inclusive Design Standards. In much of its

communications, the University highlights that parking spaces are limited. It is essential that it plans sufficient disabled car parking spaces on campus.

The University puts in place learning support plans for disabled students which sometimes requires one to one support. This is casual but skilled work and requires qualifications. Those providing support in Eastbourne may find that travelling 20 miles for work will mean that it is not financially viable. The University needs to put in place mitigating measures which may include help with travel for these staff or working over the construction period to ensure that there are enough people trained up in Brighton.

### *Staff*

Overall, 9.5% of staff have declared a disability. The Eastbourne figures are set out below:

<b>Disability status</b>	<b>Disability declared</b>	<b>Non-disabled</b>	<b>Unknown</b>
Staff in Eastbourne	9.8%	88.2%	2%

The issues for staff and students are very similar: disabled staff will need to have dedicated car parking in the campus and reasonable adjustments made to ensure they can travel to the campus and work effectively. This should include promoting Access to Work as they may be able to provide taxis etc.<sup>5</sup>

Neurodiverse staff will also benefit from the redesign and refurbishment.

### **Recommendations:**

- Ensure there is sufficient accessible accommodation on campus.
- Ensure that accessible wayfinding and signage is clearly specified in contracts.
- Put in place guidance for people with physical, sensory, and mental impairments on how best to navigate the campus in Brighton.
- Ensure there are sufficient disabled car parking spaces for staff and students.
- Put in place plans now to ensure that there is a good supply of suitably qualified people to providing one to one learning support.
- Continue to work with Network Rail and other relevant stakeholders to improve the accessibility of Moulsecoomb station.
- Make use of Access to Work for staff.

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<sup>5</sup> Access to Work: [Access to Work: get support if you have a disability or health condition - GOV.UK \(www.gov.uk\)](https://www.gov.uk/access-to-work)

## **Gender Re-assignment**

Key findings:

- No issue identified

The Student Equalities Report states that there are 25 non-binary students in total at the University. The Staff monitoring report does not give details of non-binary staff as the numbers are under 10.

There are no issues identified for transgender staff or students. The move to Brighton is likely to be very positive for this community. Brighton and Hove Council give the following statistics:

'At least 2,760 trans adults live in Brighton & Hove, with many more who visit to socialise, study or work'.<sup>6</sup>

This means that transgender staff and students are less likely to be isolated than they may be elsewhere.

## **Marriage and Civil Partnership**

This protected characteristic is not legally a consideration for Equality Impact Assessments and no issues are identified.

## **Pregnancy and Maternity**

Key finding:

- No issue identified apart from the necessity of ensuring that anyone pregnant or looking after a child has access to health care.

### *Students*

No issues are identified. As with all students, it will be vital that any pregnant students can easily access the medical care they require and so as part of the planning, the University will need to make sure the GP service can accommodate the larger number of students in Brighton.

### *Staff*

As the project progresses, it will be very important to keep people on maternity leave up-to-date with developments and make sure that there is no difference in how this group of people are treated e.g. in allocation of offices or in any consultation procedures, including procedures regarding roles at risk.

Recommendations:

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<sup>6</sup> Brighton and Hove Council, Our plan 2020 to 2023 [link](#)

- Work with the CCG to ensure that there is sufficient GP provision for the increased number of students in Brighton.
- Ensure excellent communications to staff on maternity leave and equality of treatment. In the event that roles are at risk, ensure adherence to the provisions of the Maternity and Parental leave etc Regulations (1999).

### Race

Key findings:

- Ethnic minority students and staff will be part of much larger diverse communities in Brighton.
- For some, the move will be very positive.
- The cost of renting in Brighton in some areas may be challenging.

### Students

Student demographics show the following:

Just over two thirds of the University population are White (66.2%), with 10.8% identifying as Asian, 5.4% as black, 4.5% as mixed and 3.1% as other ethnic background. Around 4% of students did not provide information about their ethnicity. The distribution of ethnicity groups is similar across levels of study, with a majority of students identifying as white, followed by Asian, Black, and Mixed. Students from ethnic minority backgrounds have the highest representation at postgraduate research level, with 34%.

The Access and Participation plan notes that (1.7) commuter students are a group facing significant barriers to their university experience. Ethnic minorities and mature students were over-represented in the commuter student population when compared to the overall University population. Commuter students live in a term-time postcode more than 20 miles away from their main campus. Non-continuation rates are higher than that of the University average in each of the last three years. Similarly, the attainment, proportion of 'good degrees,' of this group of students is also generally below that of the University average.

We were also told that students from ethnic minority students can experience bias in Eastbourne as it is much less diverse than Brighton. 'Black students can feel watched' in an environment that is predominantly White.

It is likely therefore that the move to campuses in Brighton will have a positive impact on this group, the commute will be easier for those on the commuter route from South London and they will be part of a more diverse community. The proportion of ethnic minorities in Brighton and Hove is 19.5%.<sup>7</sup>

A report for East Sussex sets out on page 12 that 10% of the county's population are from ethnic minority backgrounds with higher figures of 13% in Eastbourne and Hastings<sup>8</sup>, so Brighton is more diverse by a significant 6% of the population.

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<sup>7</sup> Brighton and Hove Council, 2011 Census Briefing [link](#)

<sup>8</sup> East Sussex County Council, Focus on East Sussex 2012 annual monitor [link](#)

There are significant challenges in moving to Brighton. In 2018, some studies suggest Brighton is the second most expensive city to live in, in the country.<sup>9</sup> However, a study by Halifax ranks Brighton as the 7<sup>th</sup> most expensive city place to live in.<sup>10</sup> This research is contested but does suggest a high cost of living in some areas of the city. Eastbourne is also an expensive place to live but the Numbeo website says that rent there is much cheaper than Brighton and London.

The Numbeo website says that:

- Rent in Brighton is, on average, **33.64% lower** than in London
- In Eastbourne it is, it is on average, **58.41% lower** than in London.<sup>11</sup>

The University is committed to providing affordable accommodation to all first-year students but many of the students in subsequent years will need to find their own accommodation.

This is an issue under race as sadly there is a far greater proportion of ethnic minority groups living in poverty than the White population.<sup>12</sup> Some areas of Brighton are less expensive and the University should provide advice to students on how to find lower cost housing.

Some respondents to the public consultation also highlighted that the loss of the Eastbourne campus would limit the outreach of the University for those who may be from disadvantaged or from lower income backgrounds or who live further afield than Eastbourne and Hastings.

The University is already taking mitigation action by providing all first years with accommodation and it also offers student hardship grants. It is important that these are well publicised.

### *Staff*

8% of staff are from ethnic minority backgrounds with a slightly higher proportion in Health sciences. The data for schools based in Eastbourne is as follows:

<b>Ethnicity</b>	<b>Ethnic Minority backgrounds</b>	<b>White</b>	<b>Not known</b>
Staff in Eastbourne	8.9%	89.1%	2%

The move to the Brighton campuses could be very positive for representation at University of Brighton as the local population is more diverse. It can also be an opportunity for the staff networks to develop as the space and co-location will be more conducive to collaboration.

<sup>9</sup> Jolly Explorer Blog, Is Brighton Expensive For Individuals, Students & Families – A Helpful 2021 Guide [link](#)

<sup>10</sup> You Magazine, These are the top five most expensive UK cities to live in and London didn't make the list, August 2021 [link](#)

<sup>11</sup> Numbeo, Cost of living in Brighton <https://www.numbeo.com/cost-of-living/in/Brighton>

<sup>12</sup> Guardian, Nearly half of BAME UK households are living in poverty, 1<sup>st</sup> July 2020



**Recommendations:**

- Publicise support available to students e.g. hardship grants.
- Help students find reasonably priced accommodation in Brighton in their second year.
- Encourage the Staff and Student networks to make the most of the redesign.

**Religion and Belief**

Key Finding:

- Staff and students who are members of different faith communities will be part of larger communities in Brighton.

*Students*

The Student Equalities report shows that the majority of students do not belong to a religion (53.4%), just over a quarter are Christian (25.8%) and 6.9% are Muslim. The rest of religious beliefs represent percentages lower than 5%. This distribution is similar across level of study groups.

Overall, the move to Brighton will be positive for people of different religious beliefs. We were told that it could be difficult for leaders of religious faiths serving the University to travel to Eastbourne owing to the travel time involved. Co-location will mean that students of particular faiths will be part of larger communities therefore encouraging greater participation. This proximity should encourage greater participation and help to foster good relations between different communities.

*Staff*

The religious beliefs of staff in Eastbourne are set out below:

Religious Beliefs	no religion	Christian	Prefer not to say	Numbers too small to report or unknown
	32%	22.5%	5.73%	39.77%

The Staff Equality monitoring report shows that 44% of existing staff have not disclosed their religion. Of those staff who have disclosed, nearly two thirds identify as having no religion and over a quarter identify as Christian. Other religions are all under 3%.

Staff from different faiths will gain the same advantages as students: being part of a wider community with more access to faith leaders.

The redesign and refurbishment of the campus should be able to take into account the needs of different faiths, e.g. the provision of multi-faith rooms.

Recommendation:

- Ensure that in the redesign and refurbishment of the campus, faith needs are taken into account.

### Sexual orientation

Key finding:

- The move is likely to be very positive for this group.

#### *Students*

The student demographics state that at the University level, 77% of students identify as heterosexual, 1.8% as gay woman or lesbian, 2% as gay man, 5.3% as bisexual and 2.6% as other.

#### *Staff*

The data for Eastbourne is shown below:

Sexual orientation	Heterosexual	Lesbian, gay, bisexual	Unknown
Staff in Eastbourne	53%	5.3%	41.7%

Overall, the move to co-location in Brighton is likely to be very positive for LGBTQ+ group as they will be part of a wider community. A recent report by the local CCG<sup>13</sup> states that 3% of people in Eastbourne identify as LGBTQ+ whereas in Brighton, it is 11 to 15%.<sup>14</sup>

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<sup>13</sup>East Sussex: [link](#)

<sup>14</sup> Brighton and Hove Council, Our plan 2020 to 2023 [link](#)

#### **d) Conclusion**

There are many positive equality benefits from the proposed move: students and staff will be part of wider diverse communities; the design of the campuses will take into account accessibility and be particularly helpful for neurodiverse students and staff. It will be vital that the needs of different groups are considered during the transition and critical that the principles of inclusive design are communicated to the contractors and spelled out in documents so that the University achieves its ambition of accessible campuses.

Once the transition is completed, examples of the equality impact are:

- For some commuting students the journey will be easier.
- Carers living in Eastbourne may find it harder to accommodate the demands of caring with travelling to Brighton.
- Some roles that have the specific purpose of supporting the Eastbourne campus may be at risk.
- There will also be challenges such as the accessibility of the train stations.

The University can take very tangible steps to mitigate these challenges e.g. ensuring sufficient disabled car parking spaces and accessible accommodation. It needs to ensure that where resources and support are available, these are clearly highlighted and people who will benefit are encouraged to take up their entitlements.

## Appendix 1- Literature Review

### *Introduction*

It has been difficult to find EIAs on campus moves so the review looks at lessons that can be learnt from the following:

- Corporate sector
- Housing
- Best practice in employment

It also notes the particular legal obligation, HE has under the Equality Act 2010.

#### **a) Legally bound**

Section 36<sup>15</sup> imposes a duty to make reasonable adjustments in relation to leasehold and commonhold premises and (in an extension to the law that currently applies) to common parts. Those responsible for managing Higher Education Institutions (HEI) and college estates and accommodation will need to ensure that they show due regard to adjustments to ensure they can provide an inclusive living and studying environment for disabled students. Equally, institutions should ensure that any private landlords with whom they have a contractual relationship are aware of the Act and are committed to providing accessible accommodation.

#### **b) Best practice in Higher Education on design and refurbishment of buildings**

The Equality Challenge Unit (now part of Advance HE) produced a briefing and checklist<sup>16</sup> to promote inclusive practice in building design and refurbishment in higher education, through outlining a process that will ensure equality is taken into consideration at key stages of development. Developed in partnership with members of the Association of College & University Business Officers (CUBO) and the Association of University Directors of Estates (AUDE), the document shows how the diverse needs of students and staff can be built into the design, construction and management of design and refurbishment of buildings and refurbishments to create more equitable access that go beyond the minimum legal requirements. The University may wish to refer to this guide when commissioning any building works associated with the redesign and refurbishment.

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<sup>15</sup> Equality Challenge Unit, Equality Act 2010 briefing [link](#)

<sup>16</sup> Equality Challenge Unit, Managing inclusive building design for higher education: Equality briefing and process checklist [link](#)

### **c) Lessons from the corporate/public sector**

HMRC have worked over a number of years on the equality impact of moving from small local offices to larger regional centres.<sup>17</sup> In their most recent update, they focussed on carers, part-time colleagues, colleagues aged over 50 and disabled colleagues. They identified that longer or more complex journeys were a significant barrier for these colleagues. Changes to their journey would not provide enough flexibility to help meet caring commitments, health issues have an impact on the capacity for some to manage longer and more difficult journeys and, for part-time colleagues, the increased journey time could be disproportionate to the hours worked or their working pattern. They have come up with a range of mitigating actions including offering more homeworking when possible and also have offered the following:

- Improved the support available to colleagues who relocate or have longer journeys to work, including paying the full amount of any additional travel costs.

### **Lessons from the housing sector**

There is a very useful Equality Impact Analysis completed by Southwark Council for the Aylesbury Estate which highlighted the potential particular impacts on different groups.

*Aylesbury Estate Equality Impact Analysis (2009)*

The EIA produced by Southwark<sup>18</sup> notes a range of equality issues, one of which is relevant to the decision making and is highlighted here:

- The needs of certain groups need to be properly considered throughout the construction period; older people and partially sighted people may find it disorientating to deal with a constantly changing environment.

**The lesson from this report is to ensure that the needs of staff and students are carefully considered during construction.**

*A Housing Association's Decant policy*

This is an example showing how a Housing Association approached the compulsory relocation of residents.

The PA Housing Decant policy<sup>19</sup> puts in place a number of mitigating actions to minimise the disruption to vulnerable residents when a Council estate is being knocked down.

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<sup>17</sup> HMRC, People and equality impact assessment for HMRC's locations programme (2021) [link](#)

<sup>18</sup> London Borough of Southwark, APPENDIX D: EQUALITIES IMPACT ASSESSMENT FOR AYLESBURY PREFERRED OPTIONS REPORT [link](#)

<sup>19</sup> PA Housing, Permanent Decant Housing Policy [link](#)

- They will identify a dedicated member of staff who will be the key point of contact, responsible for making sure that all moves go as smoothly as possible, including arranging removals and other services.
- Treat each move individually, recognising, respecting, and responding to different needs, circumstances and requirements.

**The lesson from this policy is that when planning the move, ensure that staff and students have a key point of contact to liaise with and when necessary, put in place an individually tailored plan.**

### **Literature review on best practice in employment**

Some roles may be at risk as a result of the move. The CIPD (the Chartered Institute of Personnel and Development) sets out that redundancy should always be the option of last resort and that it is good practice to have a procedure in place.<sup>20</sup>

ACAS gives advice on redundancy<sup>21</sup> and in particular says that if voluntary redundancy is offered, it needs to be offered widely. The ACAS guide to EIA's<sup>22</sup> gives an example of how the London Probation Service provided extra career support to Black staff who had long service in order to support them during a restructure, resulting in more equal outcomes.

EHRC advice<sup>23</sup> also states that care should be taken in stating how many days off staff have had in references as this could discriminate against disabled staff.

All authorities on employment law state that it is vital that employers ensure they comply with all the relevant legislation on redundancies and do not discriminate against any of the protected characteristics e.g. selecting individuals for redundancy based on age or length of service should usually be avoided as this may also pose specific discrimination problems for employers.

**The lesson from this short review is that if the decision results in a reduction in headcount, the University need to plan how to do this carefully and ensure that it complies with the Equality Act and that there is no unintentional discrimination.**

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<sup>20</sup> CIPD, Redundancy: an introduction, 1<sup>st</sup> October 2021 [link](#)

<sup>21</sup> ACAS, Redundancy [link](#)

<sup>22</sup> ACAS, Acas managers' guide to equality impact assessments [link](#)

<sup>23</sup> EHCRC, Core guidance: Dismissal, redundancy, retirement and after a worker has left [link](#)