

Board of Governors

5 July 2022

Annual Report on Equality, Diversity and Inclusion

1 Summary

- 1.1 This report on Equality, Diversity and Inclusion is provided to the Board of Governors each year to provide assurance that the University is undertaking its duties under the Equality Act (2010). It is also intended to demonstrate the breadth and depth of the work that the University is taking to promote equality, diversity and inclusion for all. This report provides an update on the University's action on equality, diversity and inclusion for the 2021-22 academic year.
- 1.2 The University is always looking to improve and to progress issues of equality, diversity and inclusion. Increasingly the University's work on EDI is being built into the business as usual activities. For example, it is now a key pillar of the People Strategy and also the new Research Strategy. It is part of the quality assurance processes. The aim is to ensure that thinking about EDI becomes reflexive and no longer an add-on activity.
- 1.3 The University is, however, justly proud of the progress it has made in championing equality, diversity and inclusion both internally and across the sector. The University has one of the most diverse staff across the sector with 38% ethnic minority staff with representation of ethnic minority staff at all levels. Indeed, we have ethnic minority representation on senior management and also the highest levels of ethnic minority and in particular Black professors in the UK. Female representation is also at all levels. This success is also reflected in our student profile where we are very successful in improving access to under-represented group as 62% of students at the University are from black and ethnic minority backgrounds, we have significant numbers of mature students and 49% of come from the most deprived areas (IMD1-2 quintiles).

1.4 This report is also reviewed by both the Academic Board.

2 Recommendation

2.1 The Board of Governors is invited to **CONSIDER** the report and its assurance that the University is meeting the Equality Duty as appropriate.

3 Background

3.1 The University is required to meet the public sector equality duty as follows:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic and those who do not.

3.2 The University has a specific duty to have one or more specific and measurable objectives to enable it to meet the Equality Duty and these are outlined in the report. This report sets out the progress made with objectives which go well beyond the requirements of the Public Sector Equality Duty, particularly by recognising that inclusion goes beyond protected characteristics and includes issues of social class.

3.3 In addition to the objectives agreed by the Board of Governors, the University identifies throughout the year where additional activities can be undertaken to further equality and inclusion and these are also contained in this report.

3.4 The University is also actively implementing OfS requirements and expectations relating to the Access and Participation Plan and now the OfS expectations on harassment and sexual misconduct. These issues are also covered by the report.

4 Equality and Diversity Advisory Group

4.1 The Equality and Diversity Advisory Group (EDAG) is responsible for considering equality and diversity issues within the University. Its work is evidence based and the membership includes those who are responsible for undertaking actions as appropriate as well as those with an interest in promoting equality, diversity and inclusion within the University. The Group receives quantitative reports as well as qualitative and reviews issues brought out by the data it receives.

4.2 The EDAG Terms of Reference are reviewed each year to ensure that they continue to be fit for purpose. The Group met on three occasions in 2021-22 and the work that it has championed is set out in this report.

5 Monitoring of the Protected Characteristics and impact assessments

5.1 The University continues to monitor staff and student diversity data. The data reviewed is set out in Appendix 1 for students and Appendix 2 for staff.

5.2 For students EDAG also receives information on the social background of students to give a wider picture in line with the University's Equality, Diversity and Inclusion Statement and Policy.

5.3 For staff, the University has been undertaking work to encourage staff to provide the data, particularly disability to ensure that it has accurate levels of reporting and thereby accurately monitor.

5.4 The University uses this data to assess the impact of its policy and procedures. As part of the Athena Swan application, the University has clarified how it undertakes equality impact assessments through the review of policies through EDAG.

5.5 EDAG has also reviewed the gender and ethnicity pay gaps each year.

6 Audit of Equality, Diversity and Inclusion

- 6.1 A KPMG Audit was undertaken of the University's policies and procedures in respect of EDI. The report was very positive with a rating of substantial assurance with only one recommendation to ensure that school groups were able to escalate issues to EDAG. This has been implemented by ensuring there is a standing item on the agenda for schools and services to raise any issues. The report is attached at Appendix 3.

7 Policies and initiatives

Athena Swan

- 7.1 Following encouragement from the Workforce Advisory Committee (WAC) of the Board of Governors to pursue the Athena Swan charter mark, a self-assessment team has been set up with representatives from most parts of the University to progress application for the award.
- 7.2 The self-assessment team is co-chaired by the Director of HR and Organisational Development, and the Associate Pro Vice-Chancellor and Executive Dean of the College of Nursing, Midwifery and Healthcare and reports from the group are now a standing item on EDAG, as well as being regularly reported to WAC, SMG and VCE to monitor progress and spread awareness. The team have progressed the completion of the first section of the application concerning the context of UWL. Staff and student data is now being analysed to complete the second section which will provide detailed overview UWL's activities in respect of gender equality, as well as a detailed five-year action plan. The work remains on course for an application to be submitted in November 2022. These projects, with clearly defined outcomes and supported by relevant data, will be worked on over the next 18-24 months, with a view to contributing to and building upon the University's Athena Swan application and accreditation in 2022.

LGBTQIA+ inclusion

- 7.3 The University values the diversity of its staff and student body, but it was felt that more work could be done to provide explicit recognition of, and support for, LGBTQIA+ staff. In 2021 an action plan was devised to ensure more inclusivity and awareness of LGBTQIA+ issues across the University. This included the development of a staff LGBTQIA+ network to provide a sense of community and peer support, along with ensuring that there is explicit consideration of LGBTQIA+ issues. This network is now well established, and the chair of the network is a member of EDAG to ensure consideration of LGBTQIA+ issues in the group. The action plan was revised in May 2022 following a mapping against the Stonewall workforce equality index. This proved a useful tool with which to review the University's policy and procedure framework and further actions have been identified to help ensure that it is inclusive.

Student appeals and mitigation

- 7.4 The Student Liaison Committee in November 2018 noted the high proportion of appeals from minority ethnic students and further analysis was carried out to identify if there were any underlying factors behind this. This also led to a review of the mitigation process to try to ensure fewer students were caught by the Appeals process.
- 7.5 The latest review of appeals was undertaken following the 2021-22 which showed that there were still a disproportionate number of appeals from students from a black background. However, these were in the College of Nursing Midwifery and Healthcare and the appeals reflected the demographics of the College. The issue will, however, be kept under careful review

Preventing Racial Harassment and Sexual Misconduct

- 7.6 The University had been working on the prevention of racial harassment and sexual

misconduct in response to the new OfS Statement of Expectations on Sexual Misconduct and Harassment. All the actions relating to this have now been completed.

- 7.7 For the 21-22 academic year, the University included reporting pathways in the Cause for Concern Policy for harassment and also domestic violence. The University also introduced Report and Support software to enable online reporting. The system was launched in September and has not been widely used and more work will be undertaken to promote the system to both staff and students in September 2022. However, reports have been made to the Student Welfare Team and students have been supported to deal with these issues. Some cases have also come through the complaints process which have then been referred to either staff or student disciplinary or through other mechanisms such as mediation as appropriate.
- 7.8 The University has a zero-tolerance approach to these harassment and sexual misconduct and cases are dealt with appropriately when raised. There are insufficient cases to report on as this might compromise confidentiality, but the University's approach has matured as we have learnt from each case.

Inclusive reading lists

- 7.9 Some of the planned work around inclusive reading lists was paused as the Library Services team throughout the pandemic. However, the activities have restarted and there have also been discussions with publishers to drive it from the supply side as well as by the University. The team will be carrying out qualitative and quantitative evaluations to review any awarding gaps for modules with an updated list compared to those that have not had the intervention yet. The team will also be looking at the actual content of textbooks and examining it to see how inclusive it is rather than just by author.

Student mentoring

- 7.10 A Black student mentoring project was launched by the Senior Lecturer for Biomedical Sciences, after discussions at previous EDAG meetings about the ethnic minority awarding gap. Using previous experience of providing mentoring, the Scheme has been piloted within the London School of Film, Media and Design, as it has been identified as having the largest awarding gap. It involves PhD students mentoring undergraduate students and final year undergraduates mentoring lower years. Feedback is being collected from students in order to develop the scheme. Student progress is being tracked Inspire and a Black student network is being developed.
- 7.11 The student peer mentoring scheme has also been revised and mentees are asked if they wish to be mentored by a student with a similar lived experience to them, including protected characteristics such as age, gender, sexuality, ethnicity or wellbeing need. The numbers of students who have been supported by peer mentoring is growing and it has been shown to improve academic performance. Wider sector reports have also reported that it can support students with their overall wellbeing.

'People like us'

- 7.12 The University is part of an OfS funded project to support Black and minority ethnic students with their mental health. The project has been set up to provide mental health and wellbeing support to Black Asian Majority Ethnic (BAME) communities, using digital innovations. The project seeks to address racial and cultural barriers and provide a safe space for students to talk. Participants can engage through in-person community workshops, online MS Teams virtual community groups, and social media content, which allows them to engage in their own time, and when they are available. A range of specific support groups for Black, Asian, and Global Majority Ethnic students were formed, and some of the pre-recorded content was co-produced with students, staff, the SU and the collaborative group. An important element of the project was that the practitioners delivering the group workshops were members of the community. The learning coming out of the project is innovative and will inform on further

work around mental health.

8 Faith and Spirituality

- 8.1 The work of the Faith and Spirituality Management Group has been ongoing through active discussion between the Senior Pro-Vice Chancellor (Student Experience) and the Students' Union. In summer 2021, the provision of the contemplation zones was changed as a result of classroom reorganisation with particular arrangements for Muslim students who wished to pray on a Friday. Although it was hoped the new arrangements would better meet the requirements of those using the spaces, there have been ongoing issues that the University has been working to resolve. The space changes that are being made as a result of further classroom development give an opportunity to review the provision and changes will be made for September 2022.

9 Networks and student groups

- 9.1 As outlined above, the University has supported the development of the LGBTQIA+ network which was an initiative brought forward by champions from this group. This network is now represented on EDAG to ensure that there is direct communication and consultation.
- 9.2 Through the Athena Swan process, two further networks have been created; a women's network and a THRIVE network. Again, these networks are represented on EDAG and regular reports are made to the group. However, these groups are run by members but can bring issues of concern or comments from the members on issues being discussed by EDAG.
- 9.3 There are also some student groups and other initiatives in schools, such as work to promote more females in STEM that are reported periodically to EDAG. These now have a standing item on the agenda to ensure that views and issues can be considered on a more systematic basis.

10 Analysis of student data

- 10.1 Appendix 1 shows the demographics of the University population. As outlined above, the University has a successful track record of addressing participation gaps between equality groups. In 2021/22 academic year, student participation for all undergraduates studying at the University broken down by equality groups is set out below. The University now monitors the participation of those in its sub-contracted partners and this information is detailed fully in Appendix 1. Going forward, the University will also be monitoring postgraduate data.
- 10.2 **Gender:** In 2021/22, 41% of students are males; an increase of 3% from 2020/21 academic year. At a School level, SCE comprise mainly males (78%), while CNMH (83%) and SHSS (81%) comprise mainly females.
- 10.3 **Ethnicity:** 62% of the student body are from an ethnic minority background; an increase of 2% from the 2020/21. 27% of the students are Asians and 24% are from a Black background. At a school level, except from LCM and LSFMD, all other Schools comprise mainly black and minority ethnic students. SoL, SBMS and CLBS have higher proportion of BAME students; 76%, 76% and 73% respectively.
- 10.4 **Disability:** 12% of the student body declared a disability in 2021/22; a decrease of 1% from 2020/21. At a School level, SoL has the higher proportion of students who declared a disability; a rate of 24%.
- 10.5 **Age of entry:** In 2021/22, 61% of the student body is mature; a decrease of 2% from 2020/21. CNMH comprise mainly mature students (85%), followed by SHSS (60%).
- 10.6 **IMD Groups:** 49% of UWL student population are from the most deprived areas (IMD1-2); a decrease of 1% from 2020/21. CNMH, LCM and LSFMD have the lower proportion of students coming from IMD1-2 group; 46%, 36% and 46% respectively.

11 Staff Diversity Data

- 11.1 The profile of staff is attached at Appendix 2 and overall, the University has a diverse staff body. The University employs a higher number of women to men, at a ratio of 56:44 although there are variations in schools. 38% of its staff are from BAME backgrounds with 38% of Academic Staff, which is significantly better than the London Higher Education (HE) sector average of 16.9% (DLA Piper Workforce Performance Indicators).
- 11.2 EDAG considered the diversity profile of staff both in terms of the headline data and also the data broken down by school. While the headline data is encouraging in terms of the diversity of staff, it was noted that there were differences by school. This is being addressed through the evolving Athena Swan action plan.

Senior Staff

- 11.3 The University's senior team (including the Vice Chancellor's Executive, Heads of School, and Heads of Professional Services) has a good balance of male and female members. The age profile of the senior management team is diverse with a range between 38-66 years.
- 11.4 The University employs a higher proportion of women 52% in the top earning group (top 5% of earners).

Staff with disabilities

- 11.5 The University continues to ensure a fair and equitable recruitment process and ensures that staff with disabilities are supported in their day to day working life. The University's application form provides the opportunity for monitoring protected characteristics during the recruitment process and encourages candidates to inform the University of any disabilities and specific adjustments required. The University also operates a 'guaranteed interview scheme' for applicants with disabilities, in cases where the applicant meets the essential criteria of the role.
- 11.6 The University has guidance in place on appraisal training in respect of disability and on retention of disabled staff, which is supported by various policies on equality and diversity and sickness management.

12 Diversity among the governing body

- 12.1 The University is keen to ensure that there is also diversity on its governing body. It has had some success in diversifying the gender profile but diversity in relation to ethnicity has reduced. The Board is working to address this in the upcoming recruitment round and the University is using an Executive Search Firm which previously yielded positive results, particularly in the recruitment of female governors.

13 Implementation of the Equality, Diversity and Inclusion Objectives

- 13.1 As outlined above, as part of the Public Sector Equality Duty under the Equality Act (2010), the University is required to have one or more objectives and that it is taking a pro-active approach to equality, diversity and inclusion across the institution. In 2019, a decision was made when the APP was introduced to align the University's objectives with the APP objectives to ensure that there was streamlined consideration of student EDI issues. This is supplemented by actions to promote EDI undertaken by schools and services. A similar approach is now being taken with staff objectives as these are now embedded into the People Strategy. To ensure that progress is being made, EDAG monitors the progress of the objectives by receiving periodic reports on the APP and progress with the People Strategy and Athena Swan.

14 Student related objectives

- 14.1 The student related objectives derive from the APP and an evaluation of progress is shown

below.

To maintain, or improve, access rates to HE for the most underrepresented groups whilst ensuring diversity of the student population.

- 14.2 In terms of maintaining access to ensure a diverse student body, where all students are equally enabled to access HE, this is still being achieved overall. Although the 2021/22 data is not yet finalised, 62% of the University's students are from a BAME background although BAME recruitment has decreased as a percentage when the University's sub-contracted partners are taken into account. The proportion of mature students rose to 68%; an increase of 2% from the previous academic year. 10% of students' population declared a disability, a decrease of 2% from 2020/21 academic year. 54% of UWL total student body comes from the most deprived areas (IMD1-2 quintiles), an increase of 3% from the previous academic year.

To narrow the degree awarding gap (structural & unexplained) for students from underrepresented backgrounds

- 14.3 Work is ongoing to reduce the awarding gap for black, Asian and minority ethnic students to 12% by 2023. This work was stalled in 2019/20 as a result of the pandemic and the effect that it had on students' academic performance. However, it did reduce in 2020-2021, particularly when taking account of the work of our academic partners. The degree awarding gap between BAME and White students at UWL including data from our UK Subcontracted partners for 2020/21 academic year was 12% overall, a decrease of 5.8% from 2019/20. There was also decrease of 5.6% between students from Black backgrounds and White students. When taking UWL data only shows that 2020/21 academic year the gap between BAME and White students for UWL reduced by 1% at 16.8%. The gap between Black and White students for UWL also decreased by 1% to 21%. There is further work to do here and this is being undertaken through focussed work with schools as an outcome of Education Review.

To improve continuation rates of students from under-represented backgrounds.

- 14.4 The improvement of continuation rates for BAME students, particularly Black students, is a key area of work. The gap between the continuation for 2019/20 (which is the last year for which figures are available) between BAME and White students at UWL was 2.3% for UWL and 4.8% for UK Subcontracted students. In 2019/20, the gap between Black and White students for UWL was 3.2% and for our partners was 8%. We are working both at UWL and with our partners to improve these figures through our work on retention monitoring generally and through improvements in the student experience.

To keep under review the changes to the mitigation process from an equality and diversity perspective.

- 14.5 In terms of the mitigation process, this is under review to ensure that the system helps those from disadvantaged groups. To this end the University is currently reviewing which students are using the system and this usage of mitigations and extensions against pass rates.

15 Staff related objectives

- 15.1 Staff related objectives agreed in March 2021 flow from the strategic theme around diversity and inclusion in our people strategy, progress to date is outlined below.

Analysis of ethnicity, gender and age pay data to identify gaps and undertake any necessary action.

- 15.2 Gender and ethnicity pay gap reports continue to be analysed at school and department level and actions are being included as part of Athena Swan Self-Assessment Team action plan. Both gaps increased this year as a result of staff changes and actions have been identified to address these gaps.

Intersectional approach to EDI including increased support to LGBTQIA+ staff and those with disabilities.

- 15.3 The work to support LGBTQIA+ staff are outlined above. In terms of disability, low levels of staff with disabilities recorded but facilities and support in place and we continue to be accredited as “disability confident” employer. To ensure that all data is being reported, staff will be asked to update their data in the summer 2022 and work is ongoing to actively encourage higher rates of staff disclosure of range of protected characteristics to ensure that it is an accurate reflection.

Broadening staff recruitment advertising and making selection processes more inclusive and values based.

- 15.4 Roles advertised on range of inclusive job boards to ensure that vacancies reach a wider audience. To aid the recruitment process, online recruitment training module has been launched and this is mandatory for all panel members to undertake. More in-depth half-day recruitment and selection training has been devised and is now available and anonymous shortlisting being used in range of professional services roles.

Use the outcomes from the REF Equality Impact Assessment to develop action plan to equitably develop research profiles of staff.

- 15.5 The new research strategy has identified a number of early career researchers who are being supported as our next cohort of research active staff, 60% of whom are female. Work is ongoing to support these staff to ensure a diverse profile of researchers going forward.

Implement actions in response to UUK and EHRC reports of racial discrimination and sexual harassment in HE.

- 15.6 This work is outlined in section 7 above. In terms of specific HR related actions, all policy and advice and guidance has been reviewed and updated. An online EDI training been relaunched, and all staff required to undertake the module. Unconscious bias training has been revamped and new sessions on “Beyond Inclusion” are currently running.
- 15.7 The other objectives to support achievement of Athena SWAN Bronze Award are outlined in section 7 above and the development of networks is outlined in section 9. Further work is ongoing to increase the number of networks and also identify EDI champions.

16 Appendices

- Appendix 1 Student profile
- Appendix 2 Staff profile
- Appendix 3 KPMG report

**Marion Lowe, University Secretary and Chief Compliance Officer Neil Henderson, Director of HR and Organisational Development
June 2022**

Appendix 1: An assessment of performance between UWL and UK Subcontracted partners data

Table 1 presents a breakdown between UWL and Subcontracted students for the last two academic years. A year on year comparison indicates that in 2021/22, 62% of UWL student population are from a black or other ethnic minority background; an increase of 2% from 2020/21 academic year. A reversed figure it is however observed in the UK Subcontracted student body in terms of ethnicity. In 2021/22, 22% of their student body are from a Black and ethnic minority background; a decrease of 3% from 2020/21. However UK Subcontracted partners have higher proportion of students from the most deprived areas in comparison to UWL. Specifically, in 2021/22, 62% of UK Subcontracted students are coming from IMD1-2, an increase of 13% from 2020/21 academic year. This is meeting the University's access and participation targets to increase participation amongst White Working Class¹ students.

Demographic	UWL only 2020/21	UWL only 2021/22	UK Subcontracted partner 2020/21	UK Subcontracted partner 2021/22
Gender - Male	38%	41%	45%	50%
Gender - Female	61%	59%	55%	50%
Ethnicity - Black and Ethnic Minority	60%	62%	25%	22%
Ethnicity - White	37%	34%	68%	67%
Ethnicity - Black	26%	24%	11%	6%
Ethnicity - Asian	24%	27%	6%	7%
Ethnicity - Mixed	6%	6%	5%	5%
Ethnicity - Other	5%	5%	3%	4%
Disability - Disability	13%	12%	7%	4%
Disability - No known disability	87%	88%	93%	96%
Age on entry - Mature	63%	61%	80%	86%
Age on entry - Young	37%	38%	20%	14%
IMD groups - IMD1-2	50%	49%	49%	62%
IMD groups - IMD3-5	48%	47%	45%	34%
Religion - Religion	66%	65%	75%	81%
Religion - No religion	29%	32%	21%	14%

Table 1: Comparison between UWL and UK Subcontracted students

Looking at the intersectionality for White Working Class as an additional group, the data indicate that 21% of the student body (including both UWL and UK Subcontracted partners) is classified as WWC; an increase of approximately 7% from 2020/21 academic year. In 2021/22, the WWC percentage rate of total (including both UWL and UK Subcontracted partners data) was 22%; an increase of 7.2% from 2020/21 academic year. Looking at the WWC percentage rate of total for UK Subcontracted data only the rate in 2021/22 academic year was reported at 43.4% on its own, an increase of 14.8%. Table 2 presents rates for 2020/21 and 2021/22 academic year.

		2020/21		2021/22	
		UWL only	UK partners	UWL only	UK partners
WWC	Enrolments	1048	532	1127	1750
	% of total	11.9%	28.6%	12.5%	43.4%
Non WWC	Enrolments	7768	1330	7902	2284
	% of total	88.1%	71.4%	87.5%	56.6%
Total		8816	1862	9029	4034

Table 2: Percentage rates for White Working Class (WWC) students

¹ WWC is a targeted group on UWL 5-year Access and Participation plan. KPI (PTA_2) is reported at 5% in 2020/21 academic year; approximately 4% decrease from the baseline data

In particular, for **UWL population only** the assessment of performance demonstrates few changes year on year. These are as follows:

1. **Gender:** In 2021/22, 41% of students are males; an increase of 3% from 2020/21 academic year. At a School level, SCE comprise mainly males (78%), while CNMH (83%) and SHSS (81%) comprise mainly females.
2. **Ethnicity:** 62% of the student body are from an ethnic minority background; an increase of 2% from the 2020/21. 27% of the students are Asians and 24% are from a Black background. At a School level, except from LCM and LSFMD, all other Schools comprise mainly black and minority ethnic students. SoL, SBMS and CLBS have higher proportion of BAME students; 76%, 76% and 73% respectively.
3. **Disability:** 12% of the student body declared a disability in 2021/22; a decrease of 1% from 2020/21. At a School level, SoL has the higher proportion of students who declared a disability; a rate of 24%.
4. **Age of entry:** In 2021/22, 61% of the student body is mature; a decrease of 2% from 2020/21. CNMH comprise mainly mature students (85%), followed by SHSS (60%).
5. **IMD Groups:** 49% of UWL student population are from the most deprived areas (IMD1-2); a decrease of 1% from 2020/21. CNMH, LCM and LSFMD have the lower proportion of students coming from IMD1-2 group; 46%, 36% and 46% respectively.

Please refer to the pie charts (Figure 1) for details

Specifically, for **UK Subcontracted partners** there have been few population demographics shifts across the 2021/22 academic year with the 2020/21. These are as follows (please note the references to Schools are the Schools who 'own' the course):

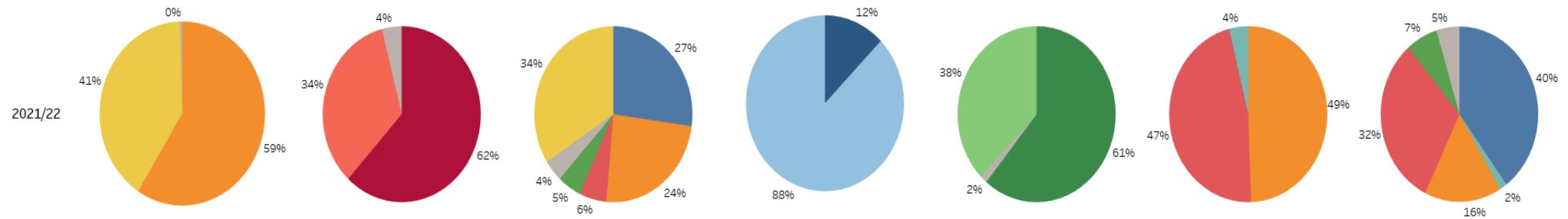
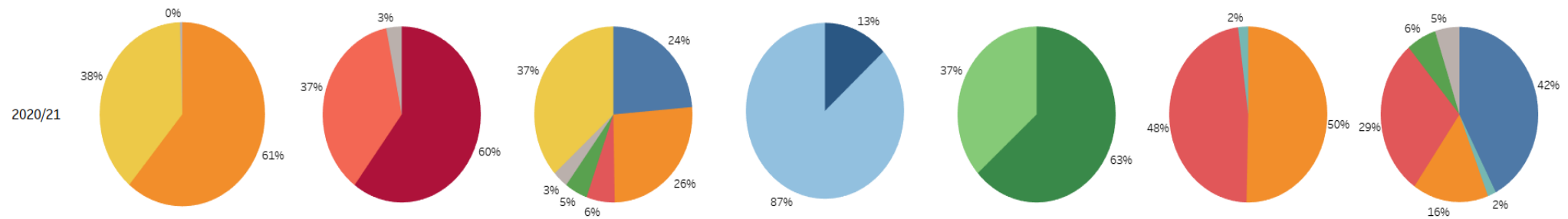
6. **Gender:** In 2021/22, 50% of partner students are males, an increase of 5% from 2020/21. Differences however exist across the Schools. Except for CNMH and LCM, all other Schools comprise mainly males.
7. **Ethnicity:** In 2021/22, 22% of the UK Subcontracted students are from a Black or other ethnic minority group; a decrease of 3% from 2020/21. Specifically, 7% are Asians, 6% as from a Black background and the remaining 9% are from Mixed or other ethnic background. At a School level, CNMH comprise mainly students coming from an ethnic minority background (62%), mainly from Black (37%) and Asian (20%) backgrounds.
8. **Disability:** In 2021/22, there is a decrease of 3% on the students who declared a disability. At a School level, data demonstrate that SCE, LSFMD and LCM have the higher proportion of students who declared a disability; 33%, 19% and 18% respectively.
9. **Age on entry:** 86% of the UK Subcontracted students are classified as mature students in 2021/22; an increase of 6%. Differences, however, exist across the Schools. All Schools, except for LCM, LGCHT and LSFMD, comprise mainly mature students.
10. **IMD Groups:** In 2021/22, 62% of the UK Subcontracted students are from the most deprived areas (IMD1-2); an increase of 13%. At a School level, CLBS and CNMH comprise the higher proportion of students coming from IMD1-2 background; 70% and 55% respectively.

Please refer to the pie charts (Figure 2) for details

Figure 1: The charts below show a comparison between the 2020/21 student profile and the latest 2021/22 profile for UWL data only

UWL/ Partner
 UWL only

Gender BAME? Ethnic group Disability Age on entry IMD groups Religion



- Gender**
 - Female
 - Male
 - Other
- Ethnic group (BAME/Non BAME)**
 - BAME
 - Non BAME
 - Unknown
- Ethnicity**
 - Asian
 - Black
 - Mixed
 - Other
 - Unknown
 - White
- Disability**
 - Disability
 - No known disability
- Age on entry (Young/Mature)**
 - Mature
 - Unknown
 - Young
- IMD Quintile group**
 - Quintiles 1 and 2
 - Quintiles 3 - 5
 - Unknown
- Religion of belief**
 - Christian
 - Christian - Methodist Church in Irel..
 - Muslim
 - No religion
 - Other religions/Spiritual
 - Unknown

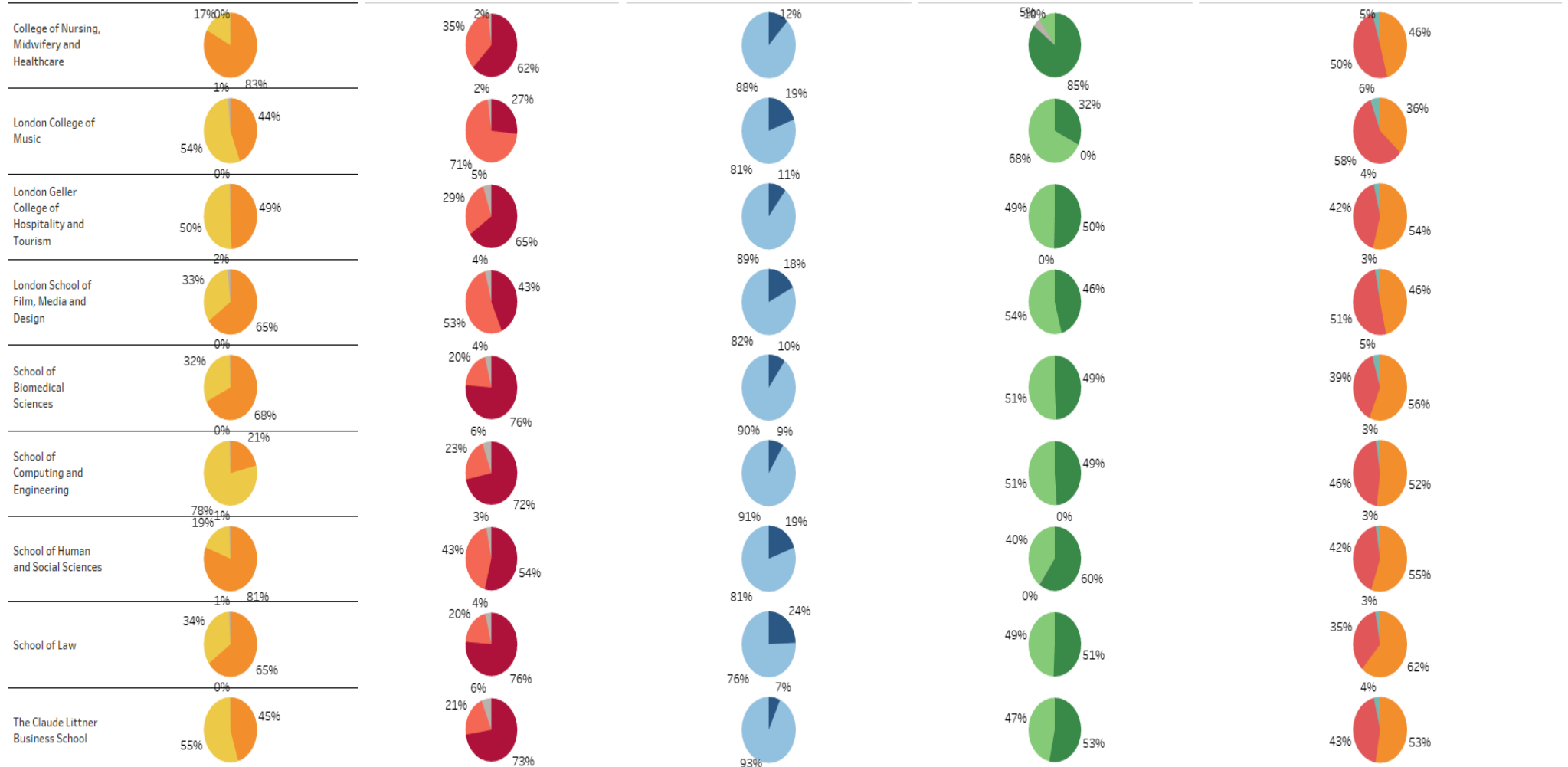
Gender

BAME?

Disability

Age on entry

IMD groups



Gender
 Female
 Male
 Other

Ethnic group (BAME/Non BAME)
 BAME
 Non BAME
 Unknown

Disability
 Disability
 No known disability

Age on entry (Young/Mature)
 Mature
 Unknown
 Young

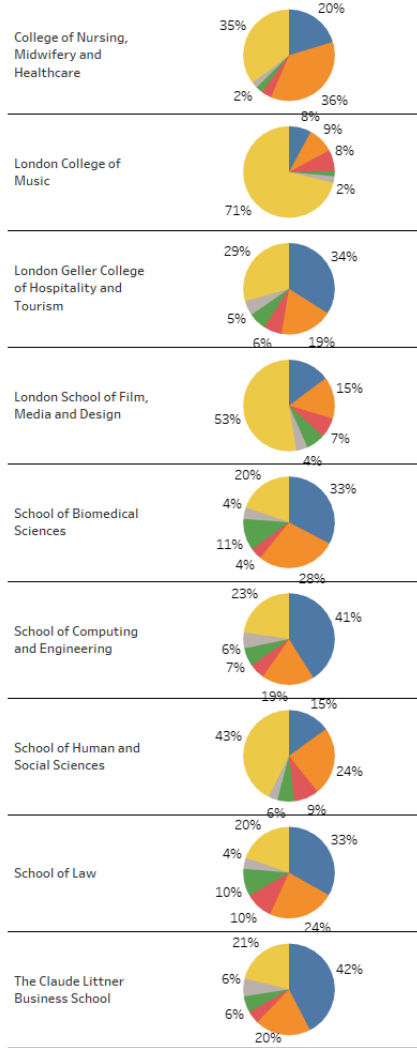
IMD Quintile group
 Quintiles 1 and 2
 Quintiles 3 - 5
 Unknown

UWL/ Partner

UWL only

Ethnic group

Ethnicity
Asian
Black
Mixed
Other
Unknown
White



Religion

Religion of belief
Christian
Christian - Methodist Church in Ireland
Muslim
No religion
Other religions/Spiritual
Unknown

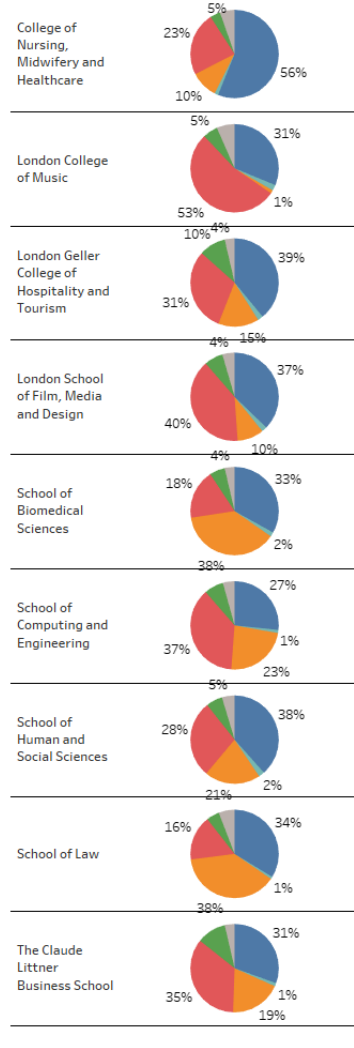


Figure 2: The charts below show a comparison between the 2020/21 student profile and the latest 2021/22 profile for UK Subcontracted partners only

UWL/ Partner

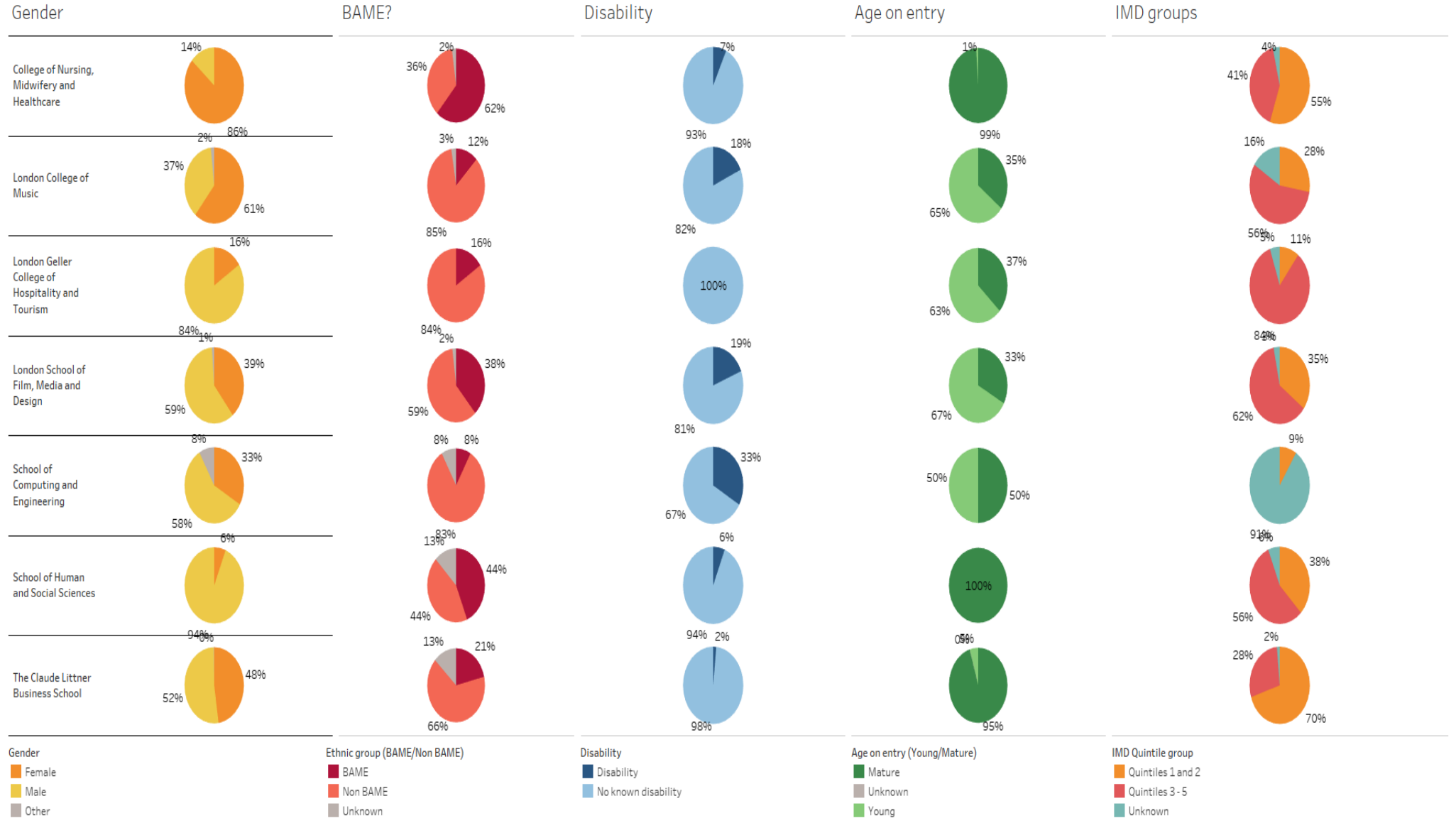
Subcontracted partners



Sub-contracted partner data by school

UWL/ Partner

Subcontracted partners

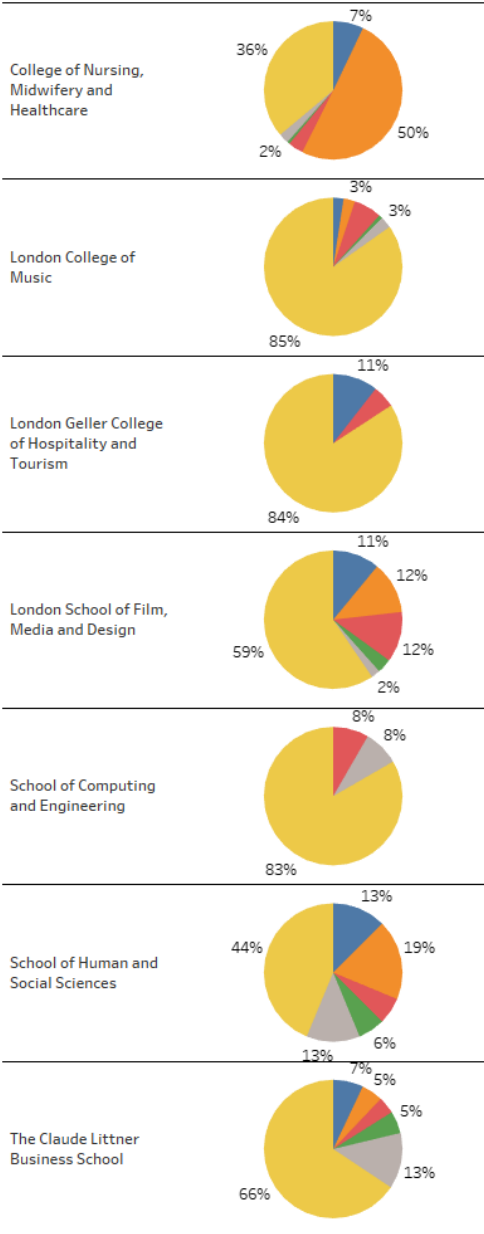


UWL/ Partner

Subcontracted partners

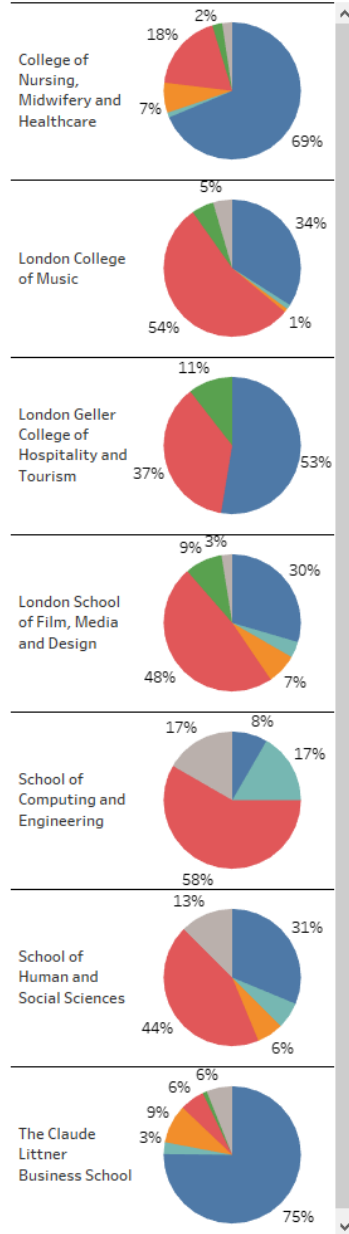
Ethnic group

- Asian
- Black
- Mixed
- Other
- Unknown
- White



Religion

- Christian
- Christian - Methodist Church in Ireland
- Muslim
- No religion
- Other religions/Spiritual
- Unknown



Staff Equality and Diversity Profile

2021/22

This paper describes the key equality and diversity characteristics of the University's workforce.

1. Gender

1.1 The University employs a higher number of female to male, at a ratio of 56:44 as shown in table 1 below. This proportion has remained consistent since the 2019/20 Academic Year.

Table 1: Percentage of female in the workforce

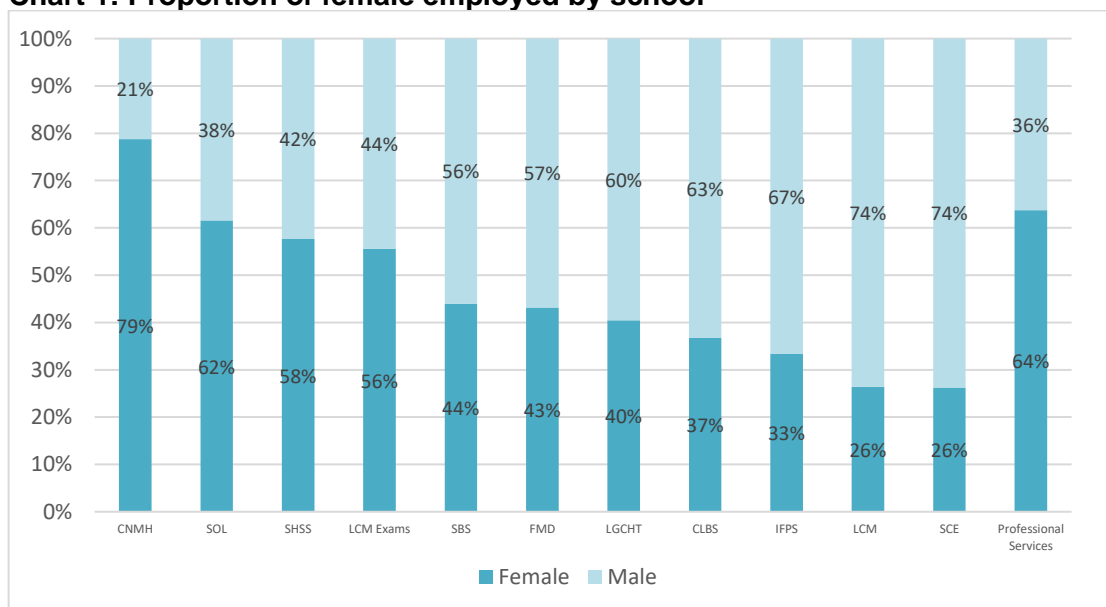
Category	University of West London	Higher education average	Higher education median
Academic staff	49%	49%	50%
Managerial and professional staff	55%	52%	54%
Support staff	66%	68%	70%
All staff	56%	56%	55%

Source: ResourceLink, 30 April 2022

DLA Piper Workforce Performance Indicators 2018

1.2 There are significant variations between schools, with female making up 26% of staff within the London College of Music compared to 58% in the School of Human and Social Sciences and 79% in the College of Nursing, Midwifery & Healthcare, as shown in chart 1 below.

Chart 1: Proportion of female employed by school



Source: ResourceLink 30 April 2022

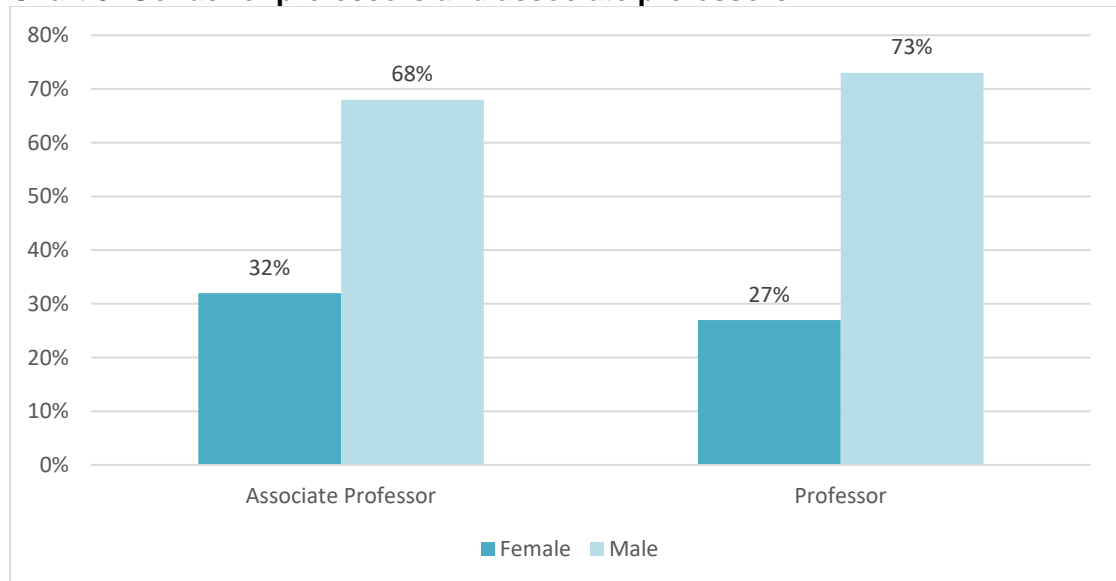
1.3 The percentage of females in the top earning group at the University has improved from last year and is above the sector average.

Chart 2: Percentage of top 5% of earners who are female



Source: ResourceLink, 28 February 2021, 30 April 2022
DLA Piper Workforce Performance Indicators 2018

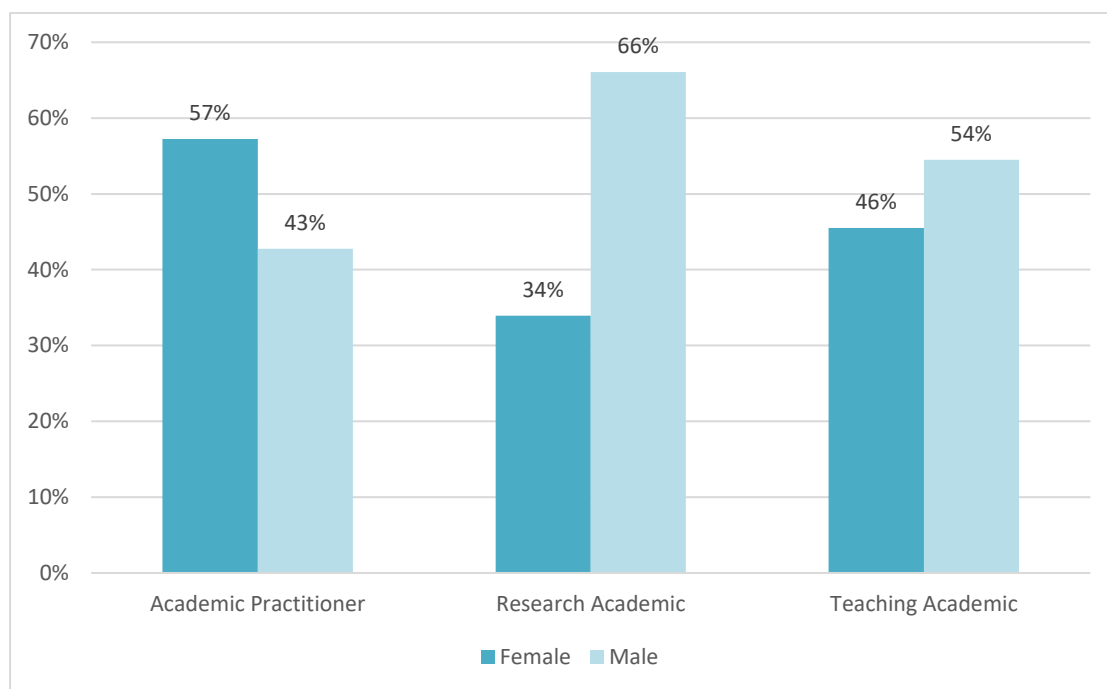
Chart 3: Gender of professors and associate professors



Category	Female	Male	Total
Associate Professor	10	21	31
Professor	13	35	48

Source: ResourceLink 30 April 2022

Chart 4: Career family by gender



Source: ResourceLink 30 April 2022

1.4 The focus of staff, and the allocation of time will vary within the different career families. For non-clinical academic staff the proportion of time spent in each of the three key areas is as follows:

Key area	Career family		
	Research academic (%)	Teaching academic (%)	Academic practitioner (%)
Teaching (maximum)	33	60	90
Research, scholarship and knowledge exchange (minimum)	33	10	5
Academic leadership and administration (remainder)	33	30	5
Total	100	100	100

2. Ethnicity

2.1 The proportion of permanent staff from Black, Asian and Minority Ethnic groups (BAME) is 38%, which compares favourably with the higher education sector, where 13% of staff are from BAME backgrounds, as shown in table 2 below. However, the BAME population in West London is between 35% and 45% and the percentage of academic staff from BAME backgrounds is 37%, compared to the university's student population at 62%. 34% of hourly paid support staff and 20% of hourly paid lecturers are from BAME backgrounds.

Table 2: Percentage of permanent workforce who are from BAME groups

Category	University of West London	London Higher education average	Higher education average	Higher education median
Academic	37%	16.9%	13%	13%
Managerial & professional staff	36%	19.3%	9%	6%
Support staff	41%	27.7%	13%	8%
All staff	38%	22.4%	13%	10%

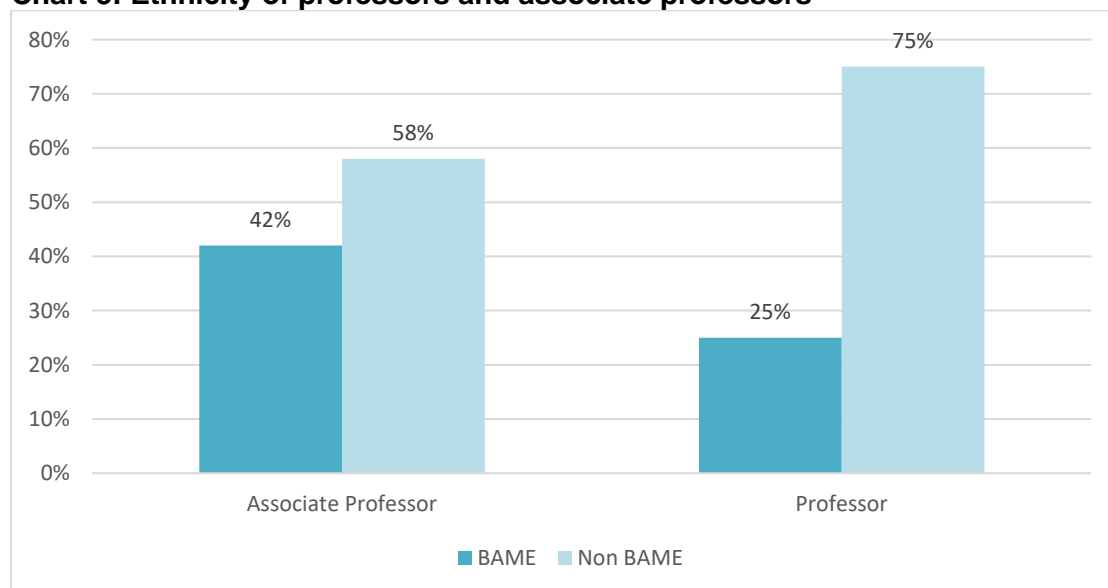
Source: ResourceLink 30 April 2022
DLA Piper Workforce Performance Indicators 2018

Table 3: Percentage of academic workforce who are from BAME groups by school

School	Permanent staff	Hourly paid lecturers
College of Nursing, Midwifery & Healthcare	37%	9%
Institute for Policing Studies	17%	0%
London College of Music	9%	14%
London School of Film, Media & Design	18%	9%
School of Biomedical Sciences	36%	0%
School of Computing & Engineering	69%	7%
School of Human and Social Sciences	29%	9%
School of Law	38%	4%
The Claude Littner Business School	67%	37%
The London Geller College of Hospitality & Tourism	21%	9%
All Schools	37%	20%

Source: ResourceLink 30 April 2022

Chart 5: Ethnicity of professors and associate professors



Category	BAME	Non BAME	Total
Associate Professor	13	18	31
Professor	12	36	48

Source: ResourceLink 30 April 2022

3. Disability

3.2 The proportion of staff with a disclosed disability is low at 5.4%. Based upon the 2011 Census 14.2% of the London Borough of Ealing population state that they had a limiting long-term health problem or disability. 12% of the University's student population have a declared disability.

Table 4: Percentage of workforce with a disability

Category	University of West London	London Higher education average	Higher education average	Higher education median
All staff	5.4%	5.5%	5.2%	5.0%

Source: ResourceLink 30 April 2022
DLA Piper Workforce Performance Indicators 2018

4. Age

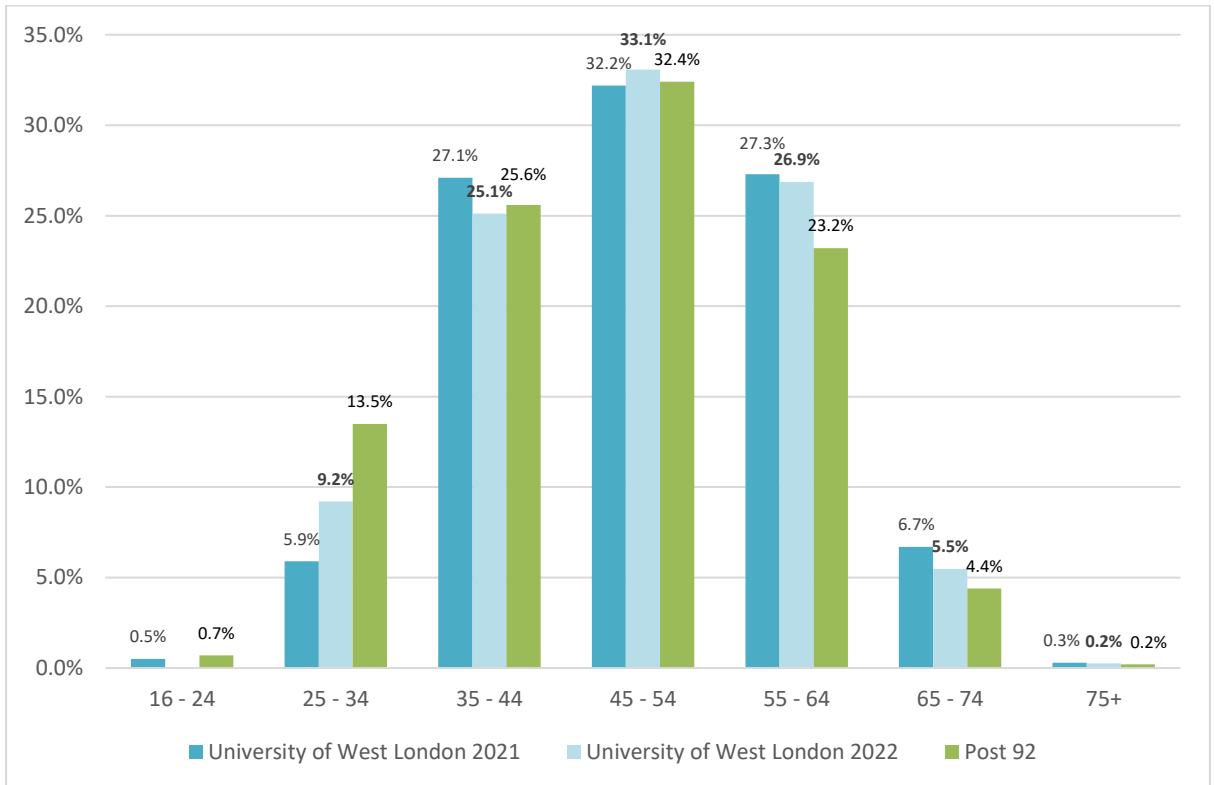
4.1 The proportion of staff aged 25-34 has increased slightly during the past 12 months. However, as shown in chart 7, the proportion of academic staff aged 25-34 is lower than other Post 92 institutions. Overall, the percentage of staff in the age groups 35-44 has decreased during the past 12 months.

Chart 6: Age profile of workforce



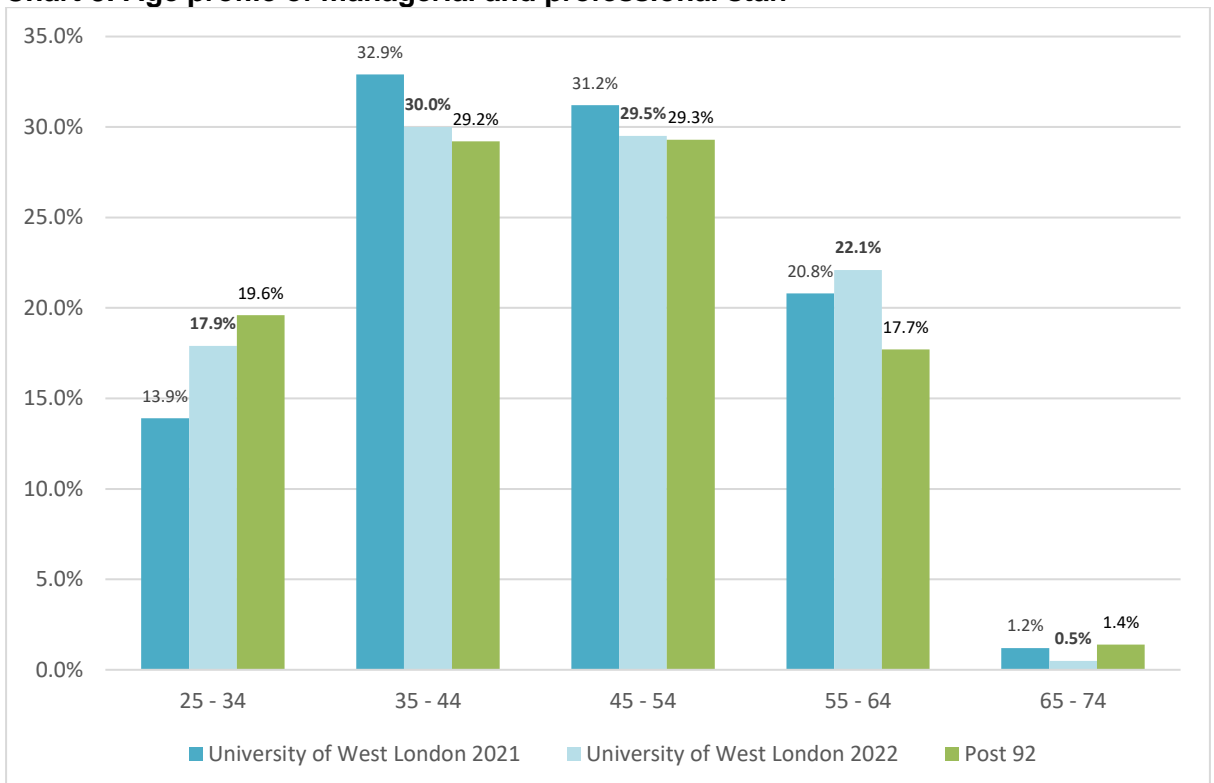
Source: ResourceLink 30 April 2022
DLA Piper Workforce Performance Indicators 2018

Chart 7: Age profile of academic workforce



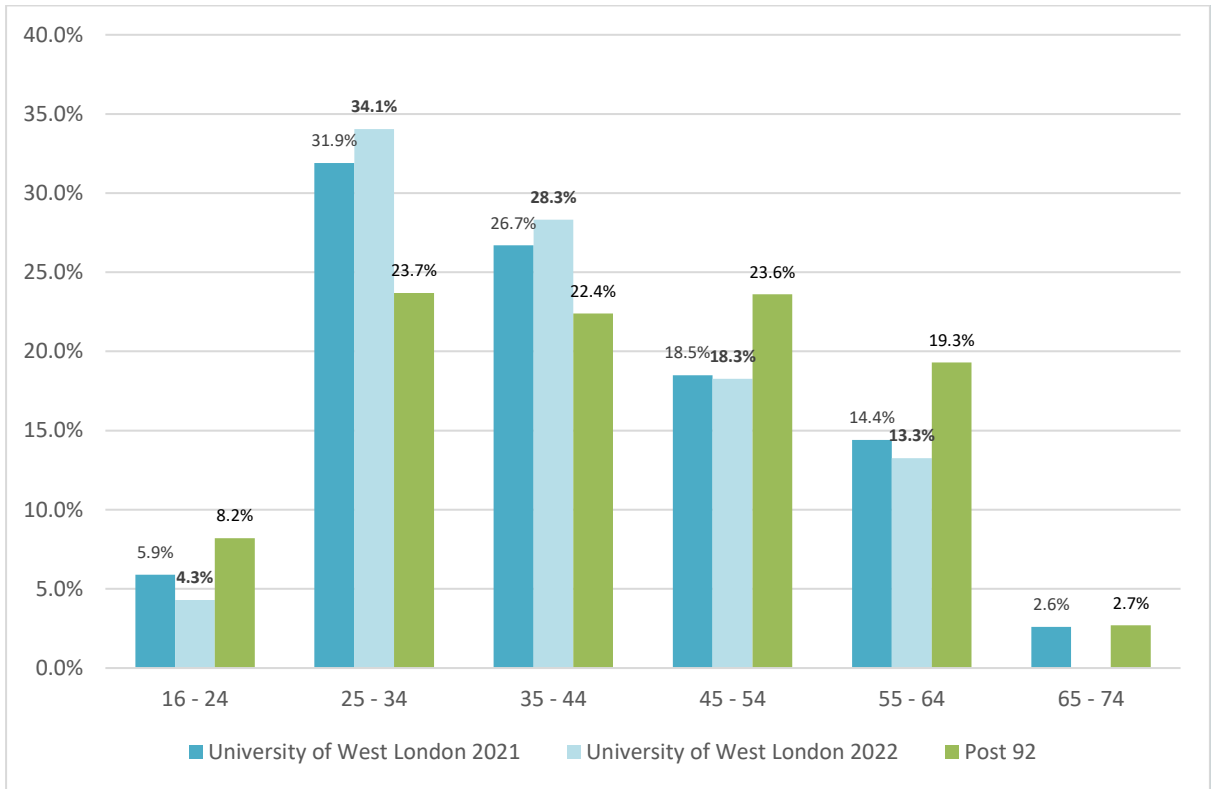
Source: ResourceLink 30 April 2022
DLA Piper Workforce Performance Indicators 2018

Chart 8: Age profile of managerial and professional staff



Source: ResourceLink 30 April 2022
DLA Piper Workforce Performance Indicators 2018

Chart 9: Age profile of support staff

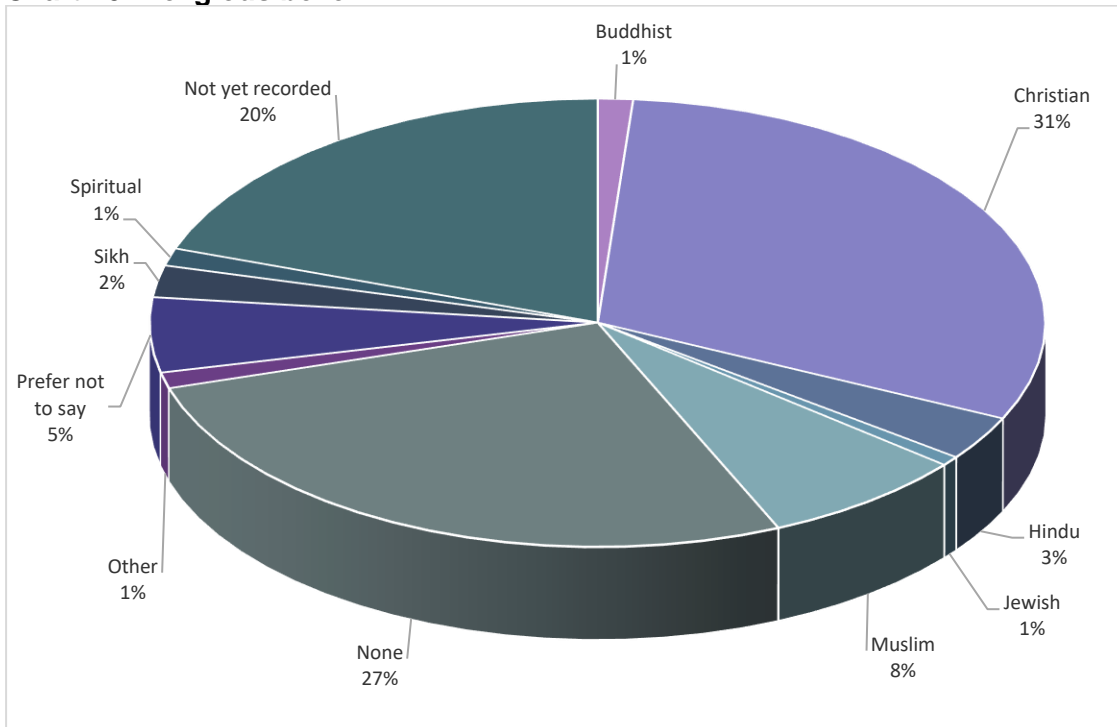


Source: ResourceLink 30 April 2022
DLA Piper Workforce Performance Indicators 2018

5. Religious Belief and Sexual Orientation

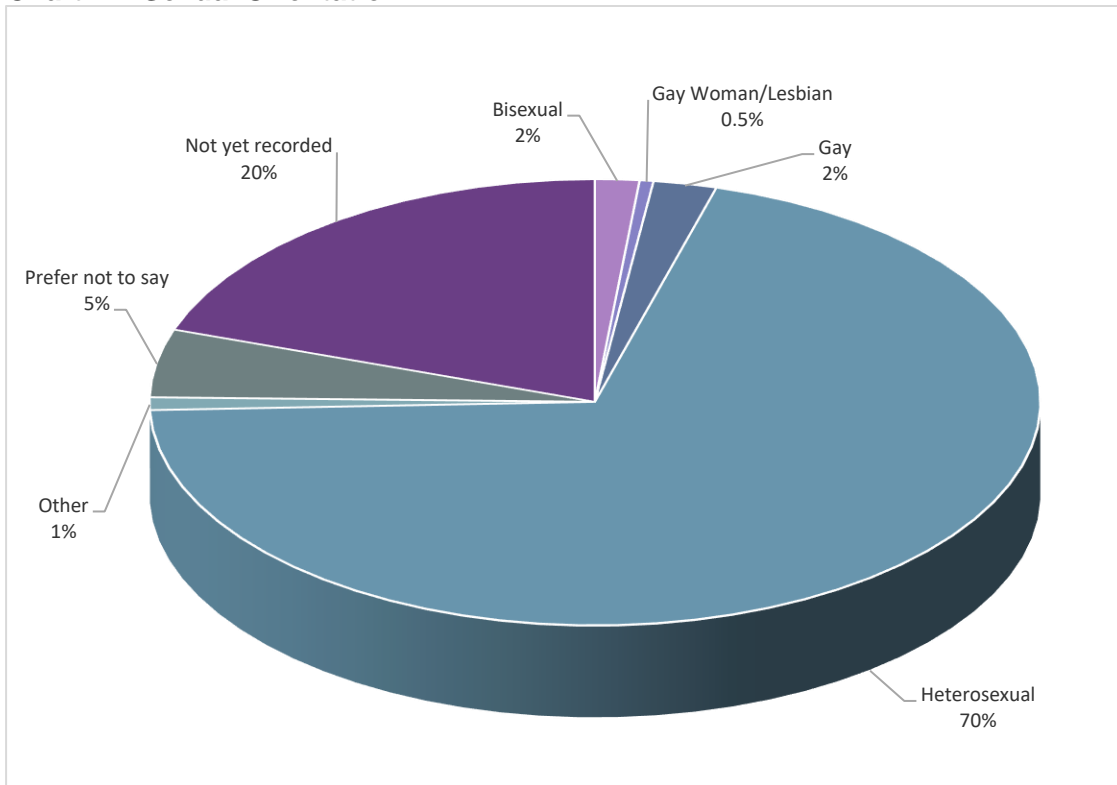
5.1 The number of staff having declared their religious belief and sexual orientation is now 80% and the number of respondents continues to improve.

Chart 10: Religious belief



Source: ResourceLink 30 April 2022

Chart 11: Sexual Orientation



Source: ResourceLink 30 April 2022



Equality, Diversity and Inclusion Governance

University of West London

KPMG Governance, Risk & Compliance Services

February 2022

Overall rating:	
>	Significant assurance
	Significant assurance with minor improvement opportunities
	Partial assurance with improvements required
	No assurance

Content

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Detailed findings

Scope extract

Rating definitions

Distribution list

For action:

- Marion Lowe, University Secretary and Chief Compliance Officer (Executive Sponsor)

For information:

- Audit and Risk Committee

Report status

Closing meeting: TBC

Draft report issued: TBC

Final report issued: TBC

Presented to Audit and Risk Committee:
28 February 2022

Executive summary

01

Conclusion

We have reviewed the design of the policies related to equality, diversity and inclusion and the design of the governance arrangements in place for overseeing the implementation of these policies. We have provided an overall assurance rating of 'significant assurance' (**green**), which is in line with management's expectations.

Overall, the University has a well designed process for monitoring the achievement of equality, diversity and inclusion objectives, which are set each year to drive a proactive approach to equality, diversity and inclusion issues. The objectives are approved by the Board of Governors. These objectives are data led where appropriate and the University has now established a data set for both staff and students which it reviews annually. We confirmed that the University is considering appropriate diversity data across staff and students, and that the data is complete and accurate.

The Equality and Diversity Advisory Group (EDAG) has been established to advise on compliance with the Equality Act 2010, promote the delivery of equality objectives across the University and update the Academic Board and the Board of Governors on equality issues and compliance. We confirmed that this forum has appropriate membership and meets sufficiently regularly to oversee the implementation of actions. Through our review of the minutes of EDAG we confirmed the objectives were being monitored at each meeting. The responsibilities and membership of EDAG is clearly set out in its terms of reference.

There have been various staff networks set up to help drive equality, diversity and inclusion throughout the institution. These include LGBTQIA+, Thrive and the Women's network. Through our review of the minutes of EDAG we identified that the LGBTQIA+ network regularly reports into the committee with updates and progress against the action plan. We also confirmed that the leads for the Women's network and the Thrive network are members of EDAG so issues could be raised through here if there is a requirement for this.

In addition to the staff networks, Schools are encouraged to set up their own working groups for particular issues. For example the School of Computing and Engineering has set up a Women in STEM working group. The work of these groups helps to drive equality, diversity and inclusion within the Schools. The agenda of these meetings is driven by the attendees but some of these groups do not formally report into EDAG. It would be impractical for representatives from all of these forums to attend EDAG, although there should be a clear mechanism to enable these groups to escalate issues to EDAG where required.

Summary

Overall rating:	Significant assurance	
Priority rating:	Control design	Operating effectiveness
High	0	0
Medium	0	0
Low	1	0

Acknowledgements

We thank the following individuals for their contribution during this internal audit:

- Marion Lowe, University Secretary and Chief Compliance Officer (Executive Sponsor)
- Sara Raybould, Senior Pro-Vice Chancellor (Student Experience)
- Neil Henderson – Director of Human Resources and Organisational development
- Dr. Kostas Tzortzis, Associate Pro-Vice Chancellor and Director of Strategic Planning and Data Services

Executive summary

Out of scope

This scope of this report is confined to the governance arrangements in place to oversee the achievement of EDI objectives, and does not provide assurance that those objectives will be achieved.

Areas of good practice

- Equality, diversity and inclusion objectives are data led where appropriate and the University had now established a data set for both staff and students which it reviews annually.
- Data is reviewed at the local level, school by school. This enables the University to identify more specific areas that require significant improvement.
- The objectives are approved annually by the Board of Governors as they are responsible for the strategic direction of the University.
- EDAG monitors the progress of the objectives by receiving the action plan at each meetings.
- The University has developed staff networks to help drive equality, diversity and inclusion throughout the organisation.
- The annual equality, diversity and inclusion report provides assurance to the Board of Governors that the University is undertaking its duties under the Equality Act 2010.

Summary of key findings

Mechanism for school working groups to report into EDAG

2.1 We identified that there is a strong mechanism for Staff Networks to report into EDAG, however this is not the case for all School Working groups.

Findings and management actions

02

2.1 Mechanism for school working groups to report into EDAG

Low

We identified that there is a strong mechanism for Staff Networks to report into EDAG, however this is not the case for the School Working groups.

We confirmed that there is a strong mechanism for centrally co-ordinated Staff Networks to report issues into EDAG as the leads of each of these networks are members of the committee. Schools and professional services are encouraged to set up groups where particular issues arise. However, whilst issues have been escalated from working groups to EDAG where required, working groups at School level do not systematically report into EDAG. The agenda of these meetings is rightly driven by the attendees but there should be a clear mechanism to enable issues that require UWL-wide consideration to be escalated.

The University should set up a more systematic mechanism where working groups can report any equality, diversity and inclusion issues they would like to escalate, to ensure that action that may require addressing from a university-wide perspective are identified and taken forward.

Risk:

There is a risk that school working groups are not receiving enough support from EDAG to enable them to implement institutional change.

Agreed management action:

EDAG should receive notes of meetings from School or professional services working groups as appropriate.

Evidence to confirm implementation:

Template reporting form on intranet

Responsible person/title:

Reports from schools included in EDAG meetings

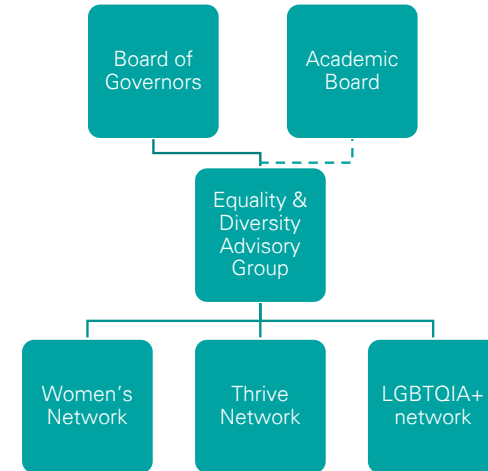
Target date:

With immediate effect

Appendix A

Detailed findings – governance structure

Element	KPMG Commentary
Board of Governors	<ul style="list-style-type: none"> The Board of Governors have overall responsibility for the effectiveness of implementation of equality, diversity and inclusion objectives and compliance with the Equality Act 2010.
Academic Board	<ul style="list-style-type: none"> EDAG reports into the Academic Board. This allows reporting into the Board of Governors.
Equality and Diversity Advisory Group (EDAG)	<ul style="list-style-type: none"> EDAG meets three times per year and has a TOR in place setting out its responsibilities and membership. We have reviewed the TOR and confirmed its membership includes representation from each of the Schools and Professional Services. EDAG is chaired by the University Secretary who also has overall responsibility for the implementation of the Public Sector Equality Duty and ensuring the University abides by its legal responsibilities. The responsibilities of EDAG are clearly detailed in the Equality, Diversity and Inclusion Policy (May 2021). These include advising on compliance with the Equality Act 2010, promoting the delivery of equality objectives across the University and Updating the Academic Board and the Board of Governors on equality issues and compliance. The group advise on the development of a range of Equality Objectives for both students and staff. The group monitor the implementation of these objectives by means of an action plan.
Staff Networks and School Working Groups	<ul style="list-style-type: none"> There are three central staff networks that have been established. These are the Women’s Network, the Thrive Network and the LGBTQIA+ Network. An action plan to improve visibility of the University’s commitment to LGBTQIA+ has been developed. Regular updates on the network and the action plan are received by EDAG. The Leads of Thrive and the Women’s network are members of EDAG, allowing reporting into the committee. Schools are also encouraged to set up their own working groups to support the work of the staff networks. For example the School of Computing and Engineering has set up a Women in STEM working group. The work of these groups helps to drive equality, diversity and inclusion within the Schools. <p>– There is no formal mechanism for School working groups to report up to EDAG. See finding 2.1.</p>



Appendix A

Detailed findings – design of controls

Below we have set out our understanding of the process and controls in place for developing and agreeing objectives to support equality, diversity and inclusion across the institution.

Process	Control	KPMG Commentary
<p>Each year the University sets objectives for both staff and students to ensure that it is taking a proactive approach to equality, diversity and inclusion across the institution.</p> <p>In order to establish the objectives, the University starts by analysing from the data perspective. Student and staff data is reviewed at an institutional-wide level to identify any significant gaps that would indicate issues across the University.</p>	<ol style="list-style-type: none"> 1. Equality, diversity and inclusion data is reviewed for both staff and students to establish key strategic objectives. 2. Student objectives are aligned to the UWL Access and Participation Plan (APP). 	<ul style="list-style-type: none"> • Student data used for equality, diversity and inclusion is provided by the Student through the self service portal 'myregister'. This is validated through the normal enrolment process. Through our 19/20 HESA review we provided assurance over the completeness and accuracy of student data. • Staff data is provided by staff at enrolment. Data is validated by HR through ID checks. • Objectives are data led where appropriate and the University has now established a data set for both staff and students which it reviews annually. • The data is reviewed at the local level, school by school. This enables the University to identify more specific areas that require significant improvement. • The student objectives are aligned to those of the UWL APP to avoid duplication. The APP is a key tool for promoting student equality. • The APP group monitors the implementation of the APP, and works alongside EDAG to address barriers to student access, success and progression.
<p>The objectives are approved by the Board of Governors.</p>	<ol style="list-style-type: none"> 3. Objectives are approved by the Board of Governors. 	<ul style="list-style-type: none"> • The objectives are approved annually by the Board of Governors as they are responsible for the strategic direction of the University.
<p>EDAG monitors the progress of the objectives and the APP.</p> <p>EDAG also monitor student complaint and grievance data. The University Secretary prepares a report and presents this to EDAG annually.</p>	<ol style="list-style-type: none"> 4. Progress of objectives and the APP is monitored by EDAG. 5. EDAG monitor student appeals and complaint data annually. 	<ul style="list-style-type: none"> • EDAG meets once per term. • EDAG monitors the progress of the objectives by receiving the action plan at each meetings. • EDAG monitor student complaints and grievances so they can triangulate issues. An update on this is presented in the annual equality, diversity and inclusion report.
<p>Staff complaint and grievance data is monitored through a tracker by the Director of HR.</p>	<p>No control identified.</p>	<ul style="list-style-type: none"> • The Director of HR monitors staff complaints and grievances data. If an issue was identified through this review, it would be escalated up to the University Secretary for reporting to EDAG. • Given the small numbers of staff complaints/grievances a formal annual report is not required.

Appendix A

Detailed findings – design of controls

Process	Control	KPMG Commentary
<p>The University has developed staff networks to help drive equality, diversity and inclusion throughout the organisation.</p>	<p>6. LGBTQI+ report with an action plan at each meeting of EDAG.</p> <p>7. The leads of Thrive and the Women’s network are members of EDAG.</p>	<ul style="list-style-type: none"> • The staff networks include LGBTQI+, Thrive and the Women’s network • The leads of each of these networks have representation on EDAG. • It was agreed in March 2021 that LGBTQI+ will report formally to each EDAG meeting with an action plan. • The Schools have also set up their own working groups to support the work of the staff networks. For example the School of Computing and Engineering has set up a Women in STEM working group. The work of these groups helps to drive equality, diversity and inclusion within the Schools.
<p>A report on equality, diversity and inclusion is provided to the Board of Governors each year. This report provides an update on the University’s action on equality, diversity and inclusion.</p> <p>The report is prepared by the University Secretary and Director of HR. The report is reviewed by the Workforce Advisory Committee and Academic Board ahead of presentation to the Board of Governors.</p>	<p>8. Annual equality, diversity and inclusion report is presented to the Board of Governors.</p>	<ul style="list-style-type: none"> • The annual report provides assurance that the University is undertaking its duties under the Equality Act 2010. • The annual report presents analysis of both student and staff diversity data with year on year comparisons. • Headline data is encouraging in terms of the diversity of staff, however it was noted through the 20/21 annual report that there were differences by school. These are being addressed through the Athena Swan and Beyond Working Group

Appendix A

Detailed findings – operating effectiveness

Below we have set out the results of operating effectiveness of the controls identified.

Control	Results
<p>Control one</p> <p>Equality, diversity and inclusion data is reviewed to establish key strategic objectives.</p>	<ul style="list-style-type: none"> We confirmed that data was reviewed for both staff and students ahead of setting the objectives for 2021/22. We confirmed the University reviewed staff and student diversity data broken down by the following equality groups: Gender, Ethnicity, Ethnic group, Disability, Age on entry, IMD and Religion. We have provided assurance over the completeness and accuracy of the student data through our 19/20 HESA review. We also confirmed that the University has validated staff data through ID checks at enrolment. For both Staff and Students we confirmed the University considered the diversity profile of staff and students both in terms of the headline data and also the data broken down by School. For staff the University also reviewed the diversity of the Senior team (including the Vice Chancellor’s Executive, Heads of Schools, and Heads of Professional Services) and the Governing Body.
<p>Control two</p> <p>Student objectives are aligned to the UWL Access and Participation Plan (APP).</p>	<ul style="list-style-type: none"> We confirmed that the 2021/22 student objectives were aligned to the 2020-2025 Access and Participation plan. We confirmed the effectiveness of the APP Group in monitoring the Access and Participation Plan as part of our compliance with OfS review in 2019-20.
<p>Control three</p> <p>Objectives are approved by the Board of Governors.</p>	<ul style="list-style-type: none"> We confirmed that the equality, diversity and inclusion objectives for 2021/22 were approved by the Board of Governors in July 2021.
<p>Control four</p> <p>Progress of objectives and the APP is monitored by EDAG.</p>	<ul style="list-style-type: none"> We reviewed the minutes for the last three EDAG meetings and confirmed that progress against the equality, diversity and inclusion objectives was discussed in each of these. We confirmed progress against the APP was reported in each of the last three EDAG meetings.
<p>Control five</p> <p>EDAG monitor student appeals and complaints data annually.</p>	<ul style="list-style-type: none"> We confirmed the University Secretary performed a review over student appeals and complaints data for 2020/21. This was presented to EDAG in March 2021.

Appendix A

Detailed findings – operating effectiveness

Control	Results
Control six LGBTQI+ report with an action plan at each of the EDAG meetings.	<ul style="list-style-type: none">• It was agreed following a proposal to EDAG in March 2021 that LGBTQI+ would be a standing agenda item.• We confirmed through a review of the May 2021 minutes that the network reported into EDAG with its action plan.
Control seven The leads of Thrive and the Women's network are members of EDAG.	<ul style="list-style-type: none">• We reviewed the TOR and minutes for EDAG and confirmed the leads of the Thrive network and the Women's network are members and in attendance at the meetings.
Control eight Annual equality, diversity and inclusion report is presented to the Board of Governors.	<ul style="list-style-type: none">• We confirmed that the 20/21 annual equality, diversity and inclusion report was presented to the Board of Governors in July 2021.

Appendix B

Scope extract

Background of internal audit

The Equality Act (2010) legally protects people from discrimination in the workplace and in wider society, and requires employers to undertake a number of steps to ensure equality of treatment and opportunity. The Act introduced the Public Sector Equality Duty (PSED) which created a general duty for public authorities to eliminate discrimination, advance equality of opportunity and foster good relations between people who share a protected characteristic and those that do not.

UWL is committed to providing and supporting an environment that promotes equality, diversity and inclusion, recognising that all staff and students should have equal access to the full range of institutional facilities and adjustments to working and learning practices are considered wherever appropriate in order to accommodate a more diverse University community.

The Equality and Diversity Advisory Group (EDAG) monitors, promotes and champions diversity for all students, staff and stakeholders of the University. The group is constituted of senior members of VCE, and oversees the implementation of equality, diversity and inclusion policies across the institution.

Scope of internal audit

- The scope of the equality, diversity and inclusion review included consideration of:
 - The design of policies related to equality, diversity and inclusion;

- The design of the governance arrangements in place for overseeing the implementation of equality, diversity and inclusion policies, including:
 - The membership, frequency and information considered by EDAG;
 - How equality, diversity and inclusion objectives have been defined; and
 - The process for tracking actions through to implementation.
- We assessed the design of processes in place to maintain complete and accurate data on the diversity of staff, students and key stakeholders.
 - We tested the operating effectiveness of the controls identified.

Our approach

Our work involved the following activities:

- Meetings with the key staff involved in the process;
- Walkthroughs of the process;
- Desktop review of documentation supporting the internal controls;
- Benchmarking of the current controls against good practice; and
- Sample testing where appropriate.

Key risks identified

- 1 UWL does not have an understanding of the diversity of its communities (including academic, professional and student bodies).
- 2 UWL has not defined what diversity means to the institution.
- 3 Data on the diversity of staff or students is incomplete or inaccurate.
- 4 Objectives regarding equality, diversity and inclusion have not been clearly defined.
- 5 Actions in relation to equality, diversity and inclusion are not SMART, allocated to a responsible officer and tracked through to implementation
- 6 Governance forums do not have appropriate membership, or meet sufficiently regularly to oversee the implementation of actions.
- 7 Action is not taken consistently across the institution.
- 8 The impact of actions cannot be measured.

Appendix C

Ratings definitions

We have set out below the overall report grading criteria and priority ratings used to assess each individual finding.

Overall report rating	Definition
Significant assurance	The system is well designed and only minor low priority management actions have been identified related to its operation. Might be indicated by priority three only, or no management actions (i.e. any weaknesses identified relate only to issues of good practice which could improve the efficiency and effectiveness of the system or process).
Significant assurance with minor improvement opportunities	The systems is generally well designed however minor improvements could be made and some exceptions in its operation have been identified. Might be indicated by one or more priority two management actions. (i.e. there are weaknesses requiring improvement but these are not vital to the achievement of strategic aims and objectives - however, if not addressed the weaknesses could increase the likelihood of strategic risks occurring).
Partial assurance with improvements required	Both the design of the system and its effective operation need to be addressed by management. Might be indicated by one or more priority one, or a high number of priority two management actions that taken cumulatively suggest a weak control environment. (i.e. the weakness or weaknesses identified have a significant impact preventing achievement of strategic aims and/or objectives; or result in an unacceptable exposure to reputation or other strategic risks).
No assurance	The system has not been designed effectively and is not operating effectively. Audit work has been limited by ineffective system design and significant attention is needed to address the controls. Might be indicated by one or more priority one management actions and fundamental design or operational weaknesses in the area under review. (i.e. the weakness or weaknesses identified have a fundamental and immediate impact preventing achievement of strategic aims and/or objectives; or result in an unacceptable exposure to reputation or other strategic risks).

Finding priority rating	Definition
Low	Issues arising that would, if corrected, improve internal control in general but are not management actions which could improve the efficiency and / or effectiveness of the system or process but which are not vital to achieving your strategic aims and objectives. These are generally issues of good practice that the auditors consider would achieve better outcomes.
Medium	A potentially significant or medium level weakness in the system or process which could put you at risk of not achieving its strategic aims and objectives. In particular, having the potential for adverse impact on your reputation or for raising the likelihood of your strategic risks occurring.
High	A significant weakness in the system or process which is putting you at serious risk of not achieving its strategic aims and objectives. In particular: significant adverse impact on reputation; non-compliance with key statutory requirements; or substantially raising the likelihood that any of your strategic risks will occur. Any management action in this category would require immediate attention.



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