

## Board of Management Audit & Assurance Committee

<b>Date of Meeting</b>	<b>Wednesday 15 September 2021</b>
<b>Paper No.</b>	<b>AAC1-F</b>
<b>Agenda Item</b>	<b>5.2.1</b>
<b>Subject of Paper</b>	<b>Internal Audit Report – Equality &amp; Diversity</b>
<b>FOISA Status</b>	<b>Disclosable</b>
<b>Primary Contact</b>	<b>Henderson Loggie</b>
<b>Date of production</b>	<b>6 September 2021</b>
<b>Action</b>	<b>For Discussion and Decision</b>

### 1. Recommendations

The Committee is asked to consider and discuss the report and the management responses to the internal audit recommendations.

## 2. Purpose of report

The purpose of this review is to provide management and the Audit and Assurance Committee with assurance on key controls relating to the curriculum and financial plans in place for City of Glasgow College and their alignment with the regional plan for Glasgow and the college student number targets.

## 3. Key Insights

This internal audit of Equality and Diversity provides an outline of the objectives, scope, findings and graded recommendations as appropriate, together with management responses. This constitutes an action plan for improvement.

The Report includes a number of audit findings which are assessed and graded to denote the overall level of assurance that can be taken from the Report. The gradings are defined as follows:

Good	System meets control objectives.
Satisfactory	System meets control objectives with some weaknesses present.
Requires improvement	System has weaknesses that could prevent it achieving control objectives.
Unacceptable	System cannot meet control objectives.

## 4. Impact and implications

Refer to internal audit report.

LEVEL OF ASSURANCE

Satisfactory

# City of Glasgow College

## Equality & Diversity

Internal Audit report No: 2021/04

Draft issued: 25 August 2021

Final issued: 6 September 2021



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## Level of Assurance

In addition to the grading of individual recommendations in the action plan, audit findings are assessed and graded on an overall basis to denote the level of assurance that can be taken from the report. Risk and materiality levels are considered in the assessment and grading process as well as the general quality of the procedures in place.

Gradings are defined as follows:

<b>Good</b>	System meets control objectives.
<b>Satisfactory</b>	System meets control objectives with some weaknesses present.
<b>Requires improvement</b>	System has weaknesses that could prevent it achieving control objectives.
<b>Unacceptable</b>	System cannot meet control objectives.

## Action Grades

<b>Priority 1</b>	Issue subjecting the organisation to material risk and which requires to be brought to the attention of management and the Audit and Assurance Committee.
<b>Priority 2</b>	Issue subjecting the organisation to significant risk and which should be addressed by management.
<b>Priority 3</b>	Matters subjecting the organisation to minor risk or which, if addressed, will enhance efficiency and effectiveness.



# Management Summary

## Overall Level of Assurance

<b>Satisfactory</b>	System meets control objectives with some weaknesses present.
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## Risk Assessment

This review focused on the controls in place to mitigate the following risks on the City of Glasgow College Strategic Risk Registrar as at 20 May 2021:

- Risk number 10 - Negative impact of statutory compliance failure (Risk score 10, Amber)

## Background

As part of the Internal Audit programme at City of Glasgow College (the College) for 2020/21 we carried out a review of Equality and Diversity arrangements. The Audit Needs Assessment, completed in March 2017, identified this as an area where risk can arise and where Internal Audit can assist in providing assurances to the Board of Management and the Principal that the related control environment is operating effectively, ensuring risk is maintained at an acceptable level.

The Public Sector Equality Duty, which is set out in the Equality Act 2010, came into force in April 2011 – this is often referred to as the general duty. Scottish public authorities must have 'due regard' to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations.

Scottish Ministers made regulations in The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012, placing specific duties on Scottish public authorities to enable the better performance of the public sector equality duty. These are also known as the Scottish Specific Duties.

Over several years, the College has led equality and diversity arrangements for further and higher education organisations across Scotland and was the first college to reach the Top 100 Stonewall Index and to sign up to the Scottish Funding Council's programme on Tackling Racism on Campus.

Work is supported by a dedicated Equality, Diversity, and Inclusion (ED&I) team with priorities led by the College Secretary/Director of Planning. Updates on the ED&I priorities and actions are reported regularly to the quarterly Student Staffing and Equalities Committee, which also has responsibility for the review of reports prior to publication and for discussion of issues arising (as defined in the Committee Terms of Reference last updated in June 2021).

The scope of this audit was to review the actions taken by the College, and the systems and procedures put in place, to integrate equality into the day-to-day activity of the College.



### Scope, Objectives and Overall Findings

This audit focused on the systems of internal control in place within the College in relation to equality and diversity arrangements.

The table below notes each separate objective for this review and records the results:

Objective	Findings			Work in progress	
<b>The objective of our audit was to obtain reasonable assurance that</b>		<b>1</b>	<b>2</b>	<b>3</b>	
		<b>No. of Agreed Actions</b>			
1. The College is complying with its legal duties under: <ul style="list-style-type: none"> <li>Section 149 of the Equality Act 2010; and</li> <li>The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 as amended.</li> </ul>	<b>Satisfactory</b>	-	-	3	✓
<b>Overall Level of Assurance</b>	<b>Satisfactory</b>	-	-	<b>3</b>	System meets control objectives with some weaknesses present.

### Audit Approach

We assessed whether the objectives were met by meeting with the College Secretary / Director of Planning, members of the College’s ED&I team, and other key managers and staff responsible for equalities mainstreaming and comparing the current approach to equalities mainstreaming against the good practice guidance issued by the Equality and Human Rights Commission.

The review will be primarily of the systems and procedures in place although compliance testing will be carried out where appropriate.



### Summary of Main Findings

#### **Strengths**

- The College has established arrangements which are in line with the Equalities and Human Rights Commission guidance for Further Education (2015) and have established an Equality, Diversity and Inclusion Policy (2018) and admission procedures which are designed to ensure equality in access to education, services, facilities and by potential students from all groups in society.
- There is dedicated website content for equality, diversity and inclusion which sets out the Equality Act 2010 and duties of the College, policies, equality impact assessments (EQIAs), spiritual care, embracing diversity competition, reporting, age, gender identity and reassignment support, marriage and civil partnership support, disability, pregnancy and maternity support, race, religion and belief, sex, and sexual orientation.
- Staff complete equality and diversity training as part of their induction, ensuring that they understand the College's policy, the meaning of equality, and their legal obligations.
- There is dedicated resource through the ED&I team and reports are generated on equality mainstreaming to monitor the implementation of actions and the ongoing effectiveness of the Equalities Policy.
- Performance management systems address equality and non-discrimination.
- The College maintains a complaints procedure that is readily available online to both students and to members of College staff.
- The College has established a draft Equality Action Plan detailing further enhancements to current arrangements and PSED reports are frequently provided to the Student Staffing and Equalities Committee, who met in line with their terms of reference despite national restrictions brought by COVID-19 pandemic.
- Annual mainstreaming reporting allows the review of practices to ensure that they do not unjustifiably disadvantage groups.
- The College consults students, staff and organisations representing groups who share protected characteristics about the quality and equality of the education, benefits, facilities, and service and how they could be made more inclusive. This work is led by the Students Association and is ongoing through the annual student survey and feedback mechanisms, and
- The Draft Equality Action Plan aligned to the College Equality Outcomes that adopt specific, measurable, attainable, realistic, and time-bound (SMART) good practice. The Equality Action Plan was under development at the time of our review and was due to be approved by the College Secretary/Director of Planning who will ensure actions identified are also SMART.

#### **Weaknesses**

While the audit did not identify any significant control weaknesses, arrangements would be further enhanced if the following areas could be addressed:

- The College's Equality Act 2011 Summary of Duties (not dated) and Glossary of Terms (2017) published on the College website have not been updated in line with good version control. We were advised that this is due to changes in the resources deployed and management reprioritisation during the COVID-19 pandemic. There is risk those documents may be out of date in that they may not reflect current EDI language within the College Glossary of Terms.
- The version of the Student Bullying and Harassment Policy (May 2014) and Student Disciplinary Policy (2014) published on the College website requires to be updated. However, there is also no separate policy around what constitutes cyber bullying or where students should seek help within the College or external agencies. Work is underway by management to update these policies and planning is in place to include a section on Cyber Bullying support within the revised Student Bullying and Harassment Policy.



### Summary of Main Findings (Continued)

- The Equality Mainstreaming report 2020/21 details that since 2019, EQIAs have been completed on policies including HR, Finance, IT and COVID-19 related policies. However, while there are 26 College policies published on the website, there are only EQIAs published for 6 policies. Inspection of the EQIAs noted they were out of date or no longer applicable to current list of policies. Management reported that EQIAs have not been developed for policies recently updated, such as for the Dignity at Work Policy, Toil Policy, and Home Working Guide. The website is now under review by the ED&I Team and Marketing and management require adding EQIAs to the Policy and Procedure Tracker. While the Draft Equality Action Plan has actions to update EQIAs in line with the policy review cycle, management should be reminded that responsibility for EQIA completion lies with the Policy and procedure owners, with support from the ED&I team.

### Acknowledgment

We would like to take this opportunity to thank the staff at the College who helped us during our audit.





## Main Findings and Action Plan

### Objective 1 - The College is complying with its legal duties under:

- **Section 149 of the Equality Act 2010; and**
- **The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 as amended.**

### Section 149 of the Equality Act 2010

Through our discussions with management, and review of documentation provided, we determined how the College meets its obligations under Section 149 of the Equality Act 2010. Taking into account the legislative requirements, we aligned these with the controls put in place by the College and any future work planned by the Equality, Diversity & Inclusion (ED&I) Team.

Our review noted that the College is committed to equality, diversity and inclusivity of its students and staff. There are several key Regional and City of Glasgow College documents that set the foundation to the work underway to eliminate discrimination, harassment, victimisation and provide equality of opportunity. These include:

- The Glasgow Regional Outcome Agreement 2020-21. This has six regional equality themes, with colleges within the region having developed their own specific outcome agreement.
- City of Glasgow College has published its own Equality Outcomes framework 2017-2021 which is currently being refreshed for 2022. Equality, Diversity, and Inclusivity also features within the College's Strategic Plan 2017-2025.
- The College's Equality, Diversity, and Inclusion Policy (August 2018). The policy is due for review in 2021.
- The College's Equality, Diversity, and Inclusion Initiative 2017-2021 dovetails into wider work on the Student Experience Strategy and Access & Inclusion Strategy 2016-2020. Work to revise the Access and Inclusion Strategy during 2020 was delayed by the COVID-19 pandemic. As noted in Appendix 1 that details the Access and Inclusion map, the College has established many initiatives and arrangements to support students and staff and the College in meeting the Equalities Act 2010.

The College has documented arrangements within its Equality Act 2010 Summary of Duties and ED&I Glossary of Terms 2017. The Glossary is used to inform staff and students on the ED&I language used within the College. All key documents are available on the public website, where there is also a dedicated space to equality and diversity.



**Objective 1 - The College is complying with its legal duties under:**

- Section 149 of the Equality Act 2010; and
- The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 as amended (Continued)

Observation	Risk	Recommendation	Management Response		
<p><b>Equalities Act section 149 (Continued)</b></p> <p>The College’s Equality Act 2011 Summary of Duties on the public website is not dated to show that it has been recently reviewed and required to adopt good version control. The link to the Public Sector Equality Duties, for example, in the documented Equality Act 2011 Summary of Duties was also noted to be broken.</p> <p>The ED&amp;I Glossary of Terms (2017) also has not been updated in line with good practice, such as every 3 years, to ensure equality and diversity language used by the college is up to date and relevant.</p> <p>This is due to a change in resource and management reprioritisation over the COVID-19 pandemic.</p>	<p>Current equality, diversity and inclusion requirements are not clearly understood by readers.</p>	<p><b>R1</b> The published Equality Act 2011 Summary of Duties and Glossary of Terms should be reviewed in line with good version control, i.e. Every 3 years, and the links to the Public Sector Equality Duties should be updated.</p>	<p>Agreed.</p> <p>Actions:</p> <p>(a) Equality Act 2011 Summary of Duties is to be revised and published;</p> <p>(b) Public Sector Equality Duties (PSED) links to be updated.</p> <p><b>To be actioned by:</b></p> <p>(a) ED&amp;I Manager</p> <p>(b) Communications Team</p> <p><b>No later than:</b> 30 November 2021</p> <table border="1" data-bbox="1585 970 2092 1120"> <tr> <td data-bbox="1585 970 1872 1120"><b>Grade</b></td> <td data-bbox="1872 970 2092 1120"><b>3</b></td> </tr> </table>	<b>Grade</b>	<b>3</b>
<b>Grade</b>	<b>3</b>				



### **Objective 1 - The College is complying with its legal duties under:**

- **Section 149 of the Equality Act 2010; and**
- **The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 as amended (Continued)**

### **Section 149 of the Equality Act 2010 (Continued)**

The College has dedicated resource within the ED&I Team who report operationally to the College Secretary/Director of Planning and to the Board via the Students, Staffing and Equalities Committee who met three times over the 2020/21 academic year in line with their Terms of Reference (June 2021). Given new requirements and changes in the obligations for reporting on the impact of equality and diversity initiatives to the Scottish Funding Council by April 2023, the team have developed a working group and the College's Draft Equalities Plan.

Reports detailing the College's arrangements for meeting the Act and Public Sector Equality Duty (PSED) are reported to the Students, Staffing and Equalities Committee. In May 2021, management reported that several Statutory Reports (2021) has been published by 30 April 2021 in support of the Equality Act 2010 as following:

- Equality Mainstreaming report 2021
- College Equality Outcomes 2021
- Equality Outcomes Progress report 2021, and
- Equal Pay Statement and Information 2021.

The College encourages access and inclusion for its students, as noted in its Student Experience Strategy, and work is led by Student Services. An Access & Inclusion Strategy 2016-2020 was also established (the review for which was delayed due to the global COVID-19 pandemic and management reprioritisation and is now under review for the new academic year 2021/22), and key messages are signposted on the College website around widening participation, by recognising; prioritising; and meeting the needs of individuals. A schematic of the ED&I initiatives in place can be found below in Appendix 1.

Policies and procedures to support initiatives and legislative requirements are also established and available on the College's public website, and there is mandatory training in place ED&I for all staff.



**Objective 1 - The College is complying with its legal duties under:**

- Section 149 of the Equality Act 2010; and
- The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 as amended (Continued)

Observation	Risk	Recommendation	Management Response			
<p><b>Section 149 of the Equality Act 2010 (Continued)</b></p> <p>The online Student Bullying and Harassment Policy has not been updated since May 2014. On discussion with management the policy had been updated by the Learning &amp; Development team, however, was yet to be published on the public website.</p> <p>However, there is no separate policy around what constitutes cyber bullying or where students should seek help within the College or external agencies.</p>	<p>Students are not aware of the support available if they become victims of bullying.</p>	<p><b>R2</b> The version of the Student Bullying and Harassment Policy (May 2014) and Student Disciplinary Policy (2014) published on the College website requires to be updated, as part of the work that is already underway. The College should establish a clear policy relating to Cyber Bullying within the revised Student Bullying and Harassment Policy and where students can get support within the College or other external agencies.</p>	<p>Agreed.</p> <p>Actions:</p> <p>(a) The Student Bullying and Harassment Policy (May 2014) and Student Disciplinary Policy (2014) are to be revised as per recommendation.</p> <p>(b) Develop clear policy on Cyber Bullying within the revised Student Bullying and Harassment Policy</p> <p><b>To be actioned by:</b> Depute Principal and Vice Principal Student Experience</p> <p><b>No later than:</b> 30 November 2021</p> <table border="1" data-bbox="1585 1043 2089 1192"> <tr> <td data-bbox="1585 1043 1872 1192"><b>Grade</b></td> <td data-bbox="1872 1043 2089 1192"><b>3</b></td> </tr> </table>		<b>Grade</b>	<b>3</b>
<b>Grade</b>	<b>3</b>					



### Objective 1 - The College is complying with its legal duties under:

- **Section 149 of the Equality Act 2010; and**
- **The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 as amended (Continued)**

### Section 149 of the Equality Act 2010 (Continued)

The College's Equality Outcomes Themes are designed to align to the Glasgow Regional College Board (GRCB) Equality Outcomes set in 2017. In meeting with GRCB and assessing the impact of 2020/21 COVID-19 pandemic, a decision was made by management to keep themes unchanged. It was agreed that these themes and will be reviewed in 2022, for academic year 2022-23.

The College's Equality Outcomes 2021-2025 have set 5 objectives as follows:

1. Staff and Student diversity is increased across all protected characteristics.
2. Students and staff – across all protected characteristics - experience and contribute to a culture of dignity and respect.
3. Students and staff can confidently access relevant facilities and support.
- 4.1 Equality and Diversity is accounted for in the design and delivery of learning and teaching.
- 4.2 Equality and Diversity and anti-discriminatory practice is accounted for in the design and delivery of Learning & Development.
5. Successful student course completion – across targeted protected characteristics - is increased.

Each objective has measures and targets that will support the College in accessing the impact of work completed. To support the coordination of work, a draft ED&I Action Plan has been established. It details 41 actions, high level description of the work to be completed, link to the protected characteristic it looks to support, where the activity and impact will be reported, timeframe of reporting and initials of the action owners. Actions are to be monitored by the ED&I working group with implementation of work scheduled to commence at the start of the 2021/22 academic year. This is to allow for consideration of any further uncertainty brought about by the current COVID-19 pandemic.

We acknowledge that at the time of audit fieldwork the Draft ED&I Plan was yet to be completed and ratified by the College Secretary / Director of Planning. Therefore, as part of the work to complete and ratify this document, management should ensure that monitoring arrangements via working groups are defined, and actions adopt SMART (Specific, Measurable, Attainable, Reasonable and Timebound) good practice to ensure effective monitoring of their delivery. Management should also consider the capacity to deliver the action plan with delegation of actions where appropriate.



### Objective 1 - The College is complying with its legal duties under:

- **Section 149 of the Equality Act 2010; and**
- **The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 as amended (Continued)**

The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 as amended requires that organisations report on their progress towards the following:

- Mainstreaming the equality duty
- Equality outcomes and report progress
- Assess and review policies and practices
- Gather and use employee information
- Publish gender pay gap information
- Publish statements on equal pay
- Consider award criteria and condition in relation to procurement
- Publish in a manner that is accessible
- Consider other matters

From our work performed, it was evident that much work is completed by staff across all areas to support the College in meeting its equality, diversity, and inclusivity agenda and meeting their duties under the Public Sector Equality Duty: Scotland. Examples are as follows:

#### **Statutory Reporting**

Our review of arrangements noted compliance with the requirements with recent publications made as noted earlier in this report. Public Sector Equality Duty Mainstreaming Report (April 2021), for example, presents the College's approach to mainstreaming the Equality Act 2010 Public Sector Equality Duty (PSED) across college functions, to better perform the duty. Incorporating annual staff and Board of Management equality information, the report demonstrates how City of Glasgow College is reflecting equality throughout its functions, as well as collecting and using equalities data, to better perform the PSED. It details what has gone well and the lessons to be learned over the last academic year and impact of the 2020/21 COVID-19 pandemic.

It also presented the composition and representation of the Board of Management, actions around the projects such as Engendering STEM project and STEM Girls. In line with SFC requirements, the College has set its 2017-2021 Gender Action Plan (2017). The plan is due for review for 2022. There are three internal milestones. Progress towards the milestones are reported in the Equality Outcomes Report 2017-2021. The top 14 'super-classes' are identified and are RAG rated against their male: female imbalance between 2015/16 and 2020/21.

We noted that all statutory reports are scrutinised by the Students, Staffing and Equalities Committee and no issues were noted. Areas requiring improvement highlighted in 2021 reports were being reviewed and incorporated into the draft Equality Action plan.



### **Objective 1 - The College is complying with its legal duties under:**

- **Section 149 of the Equality Act 2010; and**
- **The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 as amended (Continued)**

### **Equality Impact Assessments**

A core requirement of mainstreaming is to complete and publish equality impact assessment (EQIA). The College should complete EQIAs on all proposed, reviewed, and revised policies, procedures, or practices (including decisions) as they arise to determine positive and negative impact on any of the protected characteristics. Conducting an EQIA can also highlight areas of good practice where the public sector equality duty is being advanced. Information on EQIAs are detailed on the public website. On the website, guidance is provided relating to the following:

- Equality Impact Assessment (EQIA) Full Guidance (November 2018 – due for review)
- FAQs on EQIAs (November 2018)
- Copy of the EQIA Form 2019

In 2019 the College moved to an electronic EQIA system in order to streamline the EQIA process.



**Objective 1 - The College is complying with its legal duties under:**

- Section 149 of the Equality Act 2010; and
- The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 as amended (Continued)

Observation	Risk	Recommendation	Management Response		
<p>The published list of EQIAs has not been reviewed or updated for some time. There are 26 College policies published on the website, however, EQIAs were published for only 6 policies. Inspection of the EQIAs noted they were out of date or no longer applicable to current list of policies.</p> <p>Several other EQIAs published were also over a decade old and did not evidence being signed by the relevant senior officer i.e., Dean. A full list was provided to management who are now reviewing arrangements with the Marketing Team to update the public website with EQIAs completed for existing policies, procedures, and decisions. Management highlighted that no EQIAs were completed for recently developed updated policies relating to the Dignity at Work Policy, Toil Policy, and Home Working Guide. This was due to management reprioritisation and capacity over the COVID-19 pandemic.</p>	<p>Adherence to the Equality Act specific duties and reputational impact to the College around evidencing the impact of policy and procedure development on protected characteristics.</p>	<p><b>R3</b> The EQIA section of the College website should be updated to reflect current EQIAs, and the process for monitoring the updating policy and procedures via the Policy and Procedure Tracker by the Compliance Manager (Performance) should include EQIAs. Older EQIAs should be held within an archived folder for reference purposes.</p> <p>All EQIAs should be dated and signed by a Dean or senior faculty management in line with College guidance.</p> <p>EQIAs for the Dignity at Work Policy, Toil Policy, and Home Working Guide should be developed.</p>	<p>Agreed.</p> <p>Actions:(a) Update EQIA section of website to ensure that out of date EQIAs are removed and up to date versions are published                      (b) Review Policy and Procedure Tracker and update process and EQIA sign-off and retention.                      (c) Review EQIA archive and advise Compliance Manager of missing EQIAs                      (d) Develop EQIAs for Dignity at Work Policy, Toil Policy, and Home Working Guide</p> <p><b>To be actioned by:</b>                      (a) Director of Communications - Communications Team                      (b) Head of Performance Improvement/ Compliance Manager                      (c) ED&amp;I Manager                      (d) Executive Director HR</p> <p><b>No later than:</b> 31 December 2021</p> <table border="1" data-bbox="1543 1198 2092 1347"> <tr> <td data-bbox="1543 1198 1830 1347"><b>Grade</b></td> <td data-bbox="1830 1198 2092 1347"><b>3</b></td> </tr> </table>	<b>Grade</b>	<b>3</b>
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### **Objective 1 - The College is complying with its legal duties under:**

- **Section 149 of the Equality Act 2010; and**
- **The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 as amended (Continued)**

The Procurement Strategy 2020-2022 states the College will pay due regard to whether the award criteria of the agreement, and the contract conditions relating to the performance of that agreement, should include considerations to enable it to better perform the PSED. The College remains responsible for meeting their obligations under the various statutes even when an external contractor provides one or more of the College's functions. The College, within its procurement practises, will take account of the following key objectives when taking forward purchasing decisions:

- Ensuring all contracts are delivered in a way which is non-discriminatory, advances equality of opportunity and fosters good relations for the Colleges' staff, students, the public, and businesses; and
- Ensuring that the goods, works, and services provided by contractors cater for all users' needs.

Their Procurement Report 2019-2020 states progress for meeting their sustainability duty including use of third sector bodies and Supplier Engagement Days. To achieve and document our compliance with the Sustainable Procurement Duty City of Glasgow College complete a Sustainability Test for each project which is included within our Project Strategy Document. The Project Strategy Document must be completed by the Procurement Service, in conjunction with the internal stakeholders, for every tender being conducted over the value of £50,000.

The College have signed up to the APUC Supply Chain Code of Conduct declaration and included this within all Competitive Tenders. They have recently extended this by ensuring all new suppliers adopted within our electronic purchasing system (PECOS) sign up to the Supply Chain Code of Conduct.

City of Glasgow College are also a member of the Electronics Watch Consortia. Electronics Watch provides a structure compliant with EU public procurement legislation to investigate, monitor and address labour issues in IT products supplied to public buyers. It is designed to utilise the collective power of buyers across Europe, whilst remaining independent of any brands or suppliers.

### **External Partnerships**

The College works closely with Advance HE and was invited to be a member of the Expert Steering Group on Race which was instrumental in developing anti-racist assets and resources for Higher Education and tertiary educational establishments. The College is also represented on the Scottish Race Equality Network (SREN) which supports and informs on issues of Race Equality in Education. The City of Glasgow College EDI Manager also Chairs the Scottish Equality Forum (SEF) which is supported by Advance HE and has representation from Colleges and Universities across Scotland. The College continues to work with several external partners and participate in the Glasgow Regional Equality Group (GREG) which meets regularly to share good practice and develop partnership working. In addition, the College are active members of the Trans Community of Practice led by The University of Strathclyde and Ayrshire College.



### **Objective 1 - The College is complying with its legal duties under:**

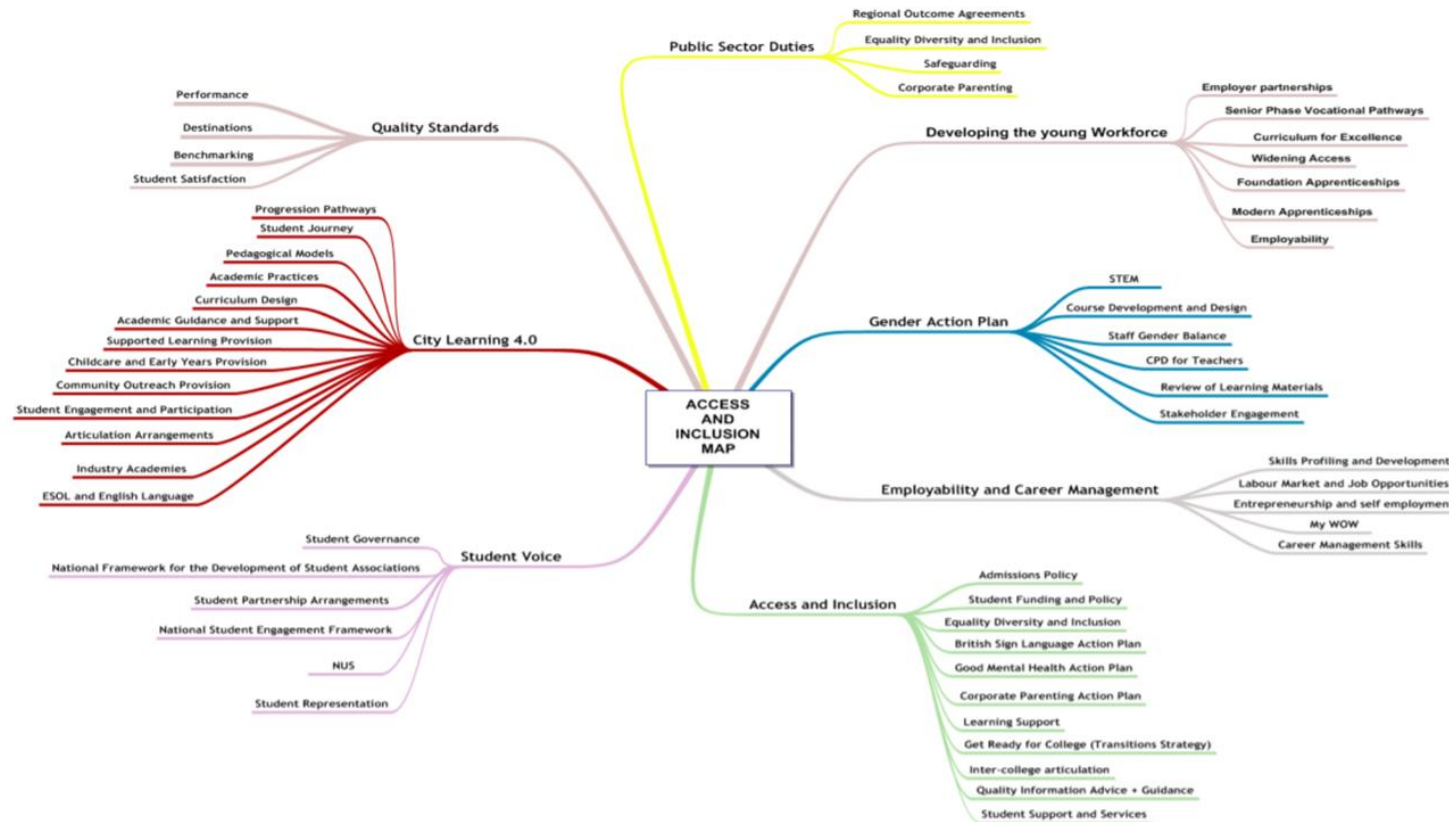
- **Section 149 of the Equality Act 2010; and**
- **The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 as amended (Continued)**

### **Conclusion**

With the exception of the minor weaknesses identified, our review of arrangements against guidance issued by the Equality and Human Rights Commission noted no further issues and it was evident that there was continuity in the ED&I messaging, with the managers interviewed reinforcing a clear focus for key management teams in delivering against the ED&I agenda.



# Appendix 1 – City of Glasgow College’s Access and Inclusion Map



**Figure 1** Schematic of the College’s arrangements to access and inclusion from their Access and Inclusion Strategy 2016-20 that is currently being updated to reflect new initiatives underway.



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