

EQIA Template

**Please refer to the guidance document to support the completion of this EIA.
This EIA has five sections A, B, C, D & E**

Section A: Planning Process

Information Required	Response
EIA Owner	Amy Brydon
Policy, practice, process, project/activity or delivery change being assessed.	Process for managing student disclosures of criminal convictions
Purpose and anticipated outcomes.	To implement a fair, transparent, legally compliant process for managing criminal conviction disclosures by moving responsibility from curriculum teams to the Safeguarding Team. The process aims to protect the College community, reduce stigma, promote rehabilitation, and ensure compliance with legislation such as the Rehabilitation of Offenders Act 1974.
Is this a new or existing policy, practice, process, project/activity or delivery change being assessed?	Revision of existing practice.
List of participants and who will be consulted in EIA e.g. staff, stakeholders, students, etc.	Safeguarding Team, curriculum staff, MIS, Student Services, Equality and Inclusion Officer, students (via representative feedback)
Who is likely to be affected? e.g. employees, visitors, contractors, women, men, young people, older people, people with disabilities etc.	Applicants and students (particularly those with criminal convictions), curriculum and safeguarding staff, MIS staff, and the wider student body. Potential impacts on protected characteristics such as age, disability and socioeconomic status.
What evidence is available of how the policy/decision, etc. affects, or may affect, protected groups? <i>Evidence could be data, research, gaps consultation etc</i>	Evidence includes: sector-wide best practice, feedback from internal safeguarding staff, legal obligations under the Rehabilitation of Offenders Act 1974. Some evidence gaps exist regarding the direct lived experiences of applicants with convictions.
Are there any other policies, practices etc. that may be affected?	Safeguarding Policy, Fitness to Study Policy, Data Protection Policy, PVG Scheme process, Equality and Diversity Policy

Date EIA started	25 September
Completion date	3 October

Section B: Meeting the Public Sector Equality Duty (PSED)

Please state in the column of 'Information Provided' how this policy, practice, process, project/activity or delivery change will comply with each element of the PSED listed in the first column.

PSED	Information Provided
Eliminating discrimination, harassment, and victimisation	The revised process removes the early-stage requirement for applicants to disclose criminal convictions, which may disproportionately impact individuals with protected characteristics (e.g. young people, men, people from minoritised ethnic backgrounds, or those with mental health conditions). Managing disclosures confidentially and professionally via the Safeguarding Team helps to eliminate discrimination and ensures all applicants are treated fairly.
Advance equality of opportunity between people who share a protected characteristic and those who do not <ul style="list-style-type: none"> • Removing disadvantage • Meeting different needs • Encouraging participation 	By shifting disclosure to a later stage and limiting it to relevant unspent convictions, the process reduces barriers to participation in education. It removes potential bias from the application process, reduces anxiety, and supports those who may have faced disadvantage due to criminal justice involvement. This helps to advance opportunity and promote access for all learners.
Foster good relations between people who share a protected characteristic and those who do not. <ul style="list-style-type: none"> • Tackling prejudice • Promoting understanding 	The revised process supports a more inclusive culture, promoting rehabilitation and reducing the stigma associated with criminal convictions. It communicates that the College values fairness, which contributes to greater understanding and trust among the wider college community. Clear communication on the College website further promotes transparency and understanding.

Section C: Assessing Impact

Please consider the impact this policy, practice, process, project/activity or delivery change will have on equality groups. Place 'X' in relevant impact box and provide further details. Further information on Equality groups can be found in Appendix 1.

Equality Group	Positive Impact	Negative Impact	No Impact	Describe the changes or actions (if any) you plan to take to mitigate or maximise impact.
Age	X			Young people, who may be overrepresented in criminal justice data, will benefit from a fairer process that delays disclosure and reduces stigma.
Disability	X			Trauma-informed training for staff will help support applicants with mental health conditions or learning difficulties through the disclosure process.
Race	X			Recognises that people from racially minoritised backgrounds may face disproportionate criminal justice involvement; the revised process reduces bias risk at application.
Sex	X			Men, who statistically have higher conviction rates, will benefit from a more inclusive and rehabilitative process.
Gender Reassignment			X	No direct impact identified. Safeguarding principles will apply equally.
Sexual Orientation			X	No direct impact identified. Process is neutral and inclusive of all identities.
Religion or Belief			X	No direct impact identified. Process is inclusive regardless of belief.
Pregnancy or Maternity			X	No direct impact identified. Process is inclusive regardless of pregnancy or maternity.
Marriage or civil Partnership			X	No impact identified.
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Additional Characteristics				

Corporate Parenting / Care Experienced	X			Care experienced applicants are more likely to face disadvantage and are more likely to have convictions; this change reduces barriers and promotes access.
Poverty or Social Deprivation	X			Applicants from deprived backgrounds may be more likely to have convictions; removing disclosure from application reduces disadvantage.
Past Criminals Convictions	X			Direct positive impact—this group is better supported through a confidential, structured, post-offer process focused on rehabilitation.
Employment or Trade Union Members			X	No impact identified.
Armed Forces Community	X			The structured and supportive disclosure process will support those returning from service who may have convictions or trauma.
Those with experience of Trauma	X			Trauma-informed approaches and safeguarding-led processes will reduce re-traumatisation and anxiety for applicants.

Section D: Acting on the result of the EIA

Before submitting this, please choose one of the outcomes listed below to show the final decision as a result of this EIA.

<ul style="list-style-type: none"> • No barriers identified – the assessment is that the policy, practice, process, project/activity or delivery change is/will be robust and can proceed. 	
<ul style="list-style-type: none"> • Adapt, adjust or change the policy, practice, process, project/activity or delivery change – this involves taking steps to remove bias and any barriers, to better advance equality and/or to foster good relations. 	X
<ul style="list-style-type: none"> • Barriers and impact identified however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy, practice, process, project/activity or delivery change. Therefore, you are going to proceed with caution knowing that it may favour some people less than others, providing justification for this decision. 	
<ul style="list-style-type: none"> • Stop the policy, practice, process, project/activity or delivery change as there are adverse effects cannot be prevented/mitigated against. 	

Section E: Monitoring and Sign Off

Monitoring



When will the policy, practice, process, project/activity or delivery change be reviewed?	One year following implementation
Can this EIA be published in full now? (yes or no) If 'no' please specify when it may be published or indicate restrictions that apply e.g. committee schedule process	Yes

Sign off

EIA Owner	Amy Brydon
Date	3.10.2025
EDI Officer	<i>Hilary Broatch</i>
Date	October 2025

Please send the completed EIA to the Equality, Diversity & Inclusion Officer
hbroatch@borderscollege.ac.uk