

Equality Impact Assessment (Level 2)

Section 1: Project overview

Project title: Review of the standards of education and training	
Name of assessor: Rebecca Kidson	Version: 2

What are the intended outcomes of this work?

1. To have standards of education and training (SETs) that are fit for purpose and appropriately aligned to the standards of proficiency and the standards of conduct, performance and ethics (SCPEs). We conduct regular reviews with the aim to strengthen the standards, and where necessary, to reflect changes to current practice within health and care practice.
2. The SETs provide outcome-focused standards for education and training that providers must meet. The purpose of the standards is to ensure high quality education and training, encourage positive student experiences, and enable learners to meet the HCPC's standards of conduct, performance, and ethics and standards of proficiency for their profession. The SETs protect learners by ensuring that they will gain the necessary knowledge, skills, and experience to practise safely, lawfully, and effectively. This approach protects the integrity and reputation of the profession and protects the public.
3. The proposed updates to the SETs follow a review of the current SETs, which included public engagement. The proposed changes are intended to ensure the standards effectively fulfil their purpose, are easy to navigate and understand by their intended readers and are up to date with health and care practice.
4. The SETs are outcome-focused and are not intended to replicate any protections, rights or responsibilities dictated by legislation such as the Human Rights Act 1998, Equality Act 2010, or Employment Rights Act 1996. Therefore, neither the SETs nor this EIA will make exhaustive reference to considerations covered by superseding legislation.

Who is affected by the work and how will they be affected?

5. Education and training providers, including practice education providers, apply the SETs. Therefore, the proposed changes will have the greatest impact for education providers. For example, the proposals may require changes to institution policies, governance structures, approach to monitoring and evaluation, internal processes and procedures, and support provided to learners and staff.
6. The SETs ensure that learners receive effective and high-quality education and training. For example, the proposed SETs relating to staffing (2.4, 3.3, 6.1, 6.2, 9.1-9.3) and programme design and delivery (8.1-8.10, 9.4, 9.5) will influence the content and quality of the education and training that learners receive. Proposed SETs relating to safety and

support in the learning environment (3.1, 3.2), expectations for ensuring service user safety (3.4, 3.5), admissions processes (4.1-4.4), communication of information and expectations from education providers (5.1-5.5), and learners receiving or providing feedback (5.6, 6.6, 6.7) will influence how learners interact with their institutions. It is helpful for learners to understand the proposed changes so that they can feed into the consultation, and to understand the final changes that will come into effect so that they know what to expect from their education provider and how to raise a concern.

7. Professional bodies have a role in ensuring high standards, aligning educational requirements and advocating for their members. The proposed changes to the SETs, particularly SETs related to curriculum content (8.7-8.10), may prompt professional bodies to review their own standards, update guidance, or support education providers to implement any changes. Some professional bodies may identify a need to adjust accreditation processes, ensure that training continues to meet the professions' needs, and manage the operational and resource implications of any change.
8. Faculty and staff involved in the creation, delivery, or assessment of education and training programmes will need to keep apprised of any changes to the SETs so that they can ensure they are meeting and applying the standards appropriately. For example, SETs relating to methods of teaching or assessment (5.6, 6.3, 6.6, 8.1-8.10), or applying and monitoring institution policies and processes (2.2, 2.3, 3.4, 4.1-4.4, 5.1-5.5, 6.7, 7.2) will influence how educators and other staff perform their roles. Standards relating to resourcing and governance structures (1.1, 2.1, 9.5), staff appointments and qualifications (2.4, 6.1, 6.2, 9.1-9.3), and supporting staff (3.1, 3.3) may also affect staff members' access to, and experience of, working in education and training settings.
9. The SETs influence the quality of education and training that professionals receive and thereby the quality of the care that they deliver to service users and the public. There are also more direct impacts for service users from SETs relating to ensuring service user safety when interacting with learners (3.1, 3.4, 3.5, 6.4), and service users contributing to the design, delivery, and evaluation of programmes (6.3).
10. HCPC partners and employees in the education department use the SETs to assess institutions and programmes for approval. Any changes to the SETs will impact these groups and the processes used to assess and approve institutions and programmes.

Section 2: Evidence and Engagement

Lack of data should not prevent a thorough EIA. Be proactive in seeking the information you need.

What evidence have you considered towards this impact assessment?

11. Desk research, including reviewing the education and training standards of other regulators, and a literature review of the key themes identified for the review, such as EDI, technology, different models of learning, and data-led decision making.
12. Consideration of internal work completed since the last SETs review, including the recent review of the SCPEs, education annual reports, a research project on newly qualified registrants' preparedness for practice, and other work in the organisation on EDI in education.
13. Results of work completed by our education team to develop EDI quality indicators for education and training, including feedback from stakeholders on defining usual and good

practice for EDI practices, enabling consistent judgements about compliance, ensuring clear expectations, and any required development linked to EDI across the standards.

14. HCPC registrant database including protected characteristics data of our registrants.
15. Insights from stakeholder engagement, detailed below, and supporting literature.

How have you engaged stakeholders in gathering or analysing this evidence?

16. We have sought information and feedback from a variety of stakeholders throughout the pre-consultation stages of the review. Each stage has involved multiple forms of engagement.
17. Our key external stakeholder groups for this review include:
 - a. Education providers
 - b. Employers
 - c. Learners
 - d. Newly qualified registrants
 - e. Patients and service users
 - f. Professional bodies
18. External stakeholder activities so far include:
 - Seeking feedback from existing HCPC forums for external stakeholders such as the professional bodies' quarterly forum and EDI forum.
 - Inviting professional bodies to seek individual meetings to discuss specific concerns or questions about the SETs review.
 - Workshops with education providers to discuss the purpose of the review, how they use the SETs, and any feedback or suggested changes. The workshops included questions specific to EDI.
 - Workshops with learners and with service users to hear about their needs and experiences and what they want to see from education providers.
 - An online pre-consultation survey of professional bodies, education providers, and service users. The survey sought feedback on the current standards and thoughts on some initial ideas for changes, including questions specifically related to EDI. We received 24 responses from professional bodies and education providers.
 - A student survey about a range of topics, including inclusion and wellbeing, which was shared with students through workshops at education institutions. We received 59 responses.
19. We established four expert panels for this review, on the topics of artificial intelligence (AI) and emerging technologies, simulation in learning, different models of learning, and EDI. The panels have each met four times between February and July 2025 to contribute to the development of the review and the proposed changes to the SETs, with a further round of meetings scheduled to take place during the consultation period.
20. We held workshops with the HCPC education team involved in the assessment and approval of education and training programmes. These workshops helped to better understand how the SETs are used and develop proposals for change.
21. We have been engaging with the HCPC's Education and Training Committee (ETC) throughout the review as part of our governance process.
22. We will be seeking feedback on the proposed changes, and this EIA, through public consultation. The consultation is open to submissions from anyone, and our communications

and engagement plan will target education providers, employers, learners and professional bodies.

Section 3: Analysis by equality group

The Equality and Human Rights Commission offers information on the [protected characteristics](#).

Describe any impact to groups or individuals with the protected characteristics listed below that might result from the proposed project. Draw upon evidence where relevant.

For all characteristics, consider **discrimination, victimisation, harassment and equality of opportunity** as well as issues highlighted in the guidance text.

General (considerations that apply to multiple groups or protected characteristics)

23. While not explicitly referenced in all the SETs, equality is an underlying value in the standards and is crucial for ensuring that providers create a high-quality and inclusive learning environment. The proposed introduction highlights some of our high-level expectations of education providers in relation to equality—primarily in the principle of person-centred education, but also in seeking diverse perspectives, challenging assumptions, and working in partnership.
24. We are also proposing changes to several SETs and the associated guidance to strengthen and clarify our expectations regarding equality, diversity, and inclusion (EDI). We know that good practice for EDI in education and training helps deliver fairer outcomes and secure a skilled, safe workforce. When education and training embeds good practice for EDI, it better prepares learners for the realities of practice, and reduces the risk of unfair barriers to success for capable learners. This contributes to the diverse and skilled workforce that is needed to meet the changing health and care needs of the public.
25. We propose to strengthen and expand the SETs relating to EDI strategies and policies (2.2, 7.2) to ensure that education providers consistently and meaningfully embed EDI across all aspects of education and training, at both a strategic and operational level. This responds to feedback from the EDI expert panel about the importance of ensuring that a commitment to EDI is present at both a programme and institution level. We are also proposing to strengthen expectations that programmes keep up to date with evolving best practice for EDI (8.8) and that monitoring and evaluation processes are used to enhance fairness and quality (2.3).
26. Proposed changes to the SET regarding monitoring and evaluation (2.3) responds to feedback from stakeholders that data collection on its own is most meaningful when followed by action. Literature supports that the value of data and evidence lies in its application and a diverse range of information sources. It also suggests that skilled data leadership and a structured approach to turning insights into action can enable education providers to make effective changes towards equity and wellbeing.¹
27. We are proposing changes to strengthen expectations that providers are proactively using relevant data to take meaningful actions towards improvement in programme quality and learner experiences. This is complemented by the principle of evidence-based and action-orientated in the introduction. Future changes to the guidance will emphasise the importance of seeking and effectively utilising a wide range of evidence and insights from

¹ [Data-driven success: Leveraging evidence-based strategies in higher education | Advance HE](#), [Misconceptions about data-based decision making in education: An exploration of the literature - ScienceDirect](#)

different perspectives to make improvements. These changes may help education providers to identify and reduce systemic barriers and increase fairness and inclusion.

28. We are also proposing a new SET that may help improve the evidence and information that learners receive about their own learning, and enable and empower them to have a more active role in their development (5.6). Research indicates that quality of feedback is strongly linked to student achievement, and suggests that inequalities in the provision of timely and meaningful feedback may contribute to differential attainment.²
29. The proposed new standard on providing timely and meaningful feedback to learners is intended to have positive impacts for all learners and may help to reduce the disadvantage that some groups can experience when feedback is not tailored, timely and constructive. This also supports the Professional Standards Authority's (PSA) expectation that regulators develop and implement plans to reduce any identified unfair differential attainment in education and training.³
30. We are proposing changes to the SETs about learner support (3.1, 3.2, 7.3) and proposing a new standard about supporting staff (3.3). These changes emphasise the importance of meeting the needs of those involved in programmes to enable quality education outcomes.
31. Similarly, proposed changes to standards about staff competencies (2.4, 6.1, 9.1, 9.2) are intended to clarify our expectations that educators and other staff involved in programmes can support the needs of a wide range of learners and have sufficient skills and knowledge around EDI, as appropriate to their role. This responds to feedback from stakeholders that some staff can be disproportionately given responsibilities relating to EDI based on their perceived identity or level of comfort with EDI matters rather than their role.
32. To further highlight expectations of fairness in education and training, we are proposing to add the word 'fair' to the wording of SETs relating to management (2.3), admissions (4.1-4.4), staff appointments (2.4), and assessments (8.6), as well as referencing fairness as a principle underpinning the SETs in the introduction. We also propose additional guidance relating to admissions and processes to appoint staff, to highlight the risk of bias in these processes through the individuals involved in the processes, as well as any tools being used.
33. This responds to insights from the expert panels and literature about the real and perceived risks of systems, such as those that utilise AI assessment tools, sometimes perpetuating bias and discrimination against disadvantaged groups.⁴ We are also proposing new standards about appropriate skills and use of technology (5.5, 9.3) to reduce the risks of uninformed technology use or the use of biased information or tools contributing to unfair, discriminatory practices.
34. We heard from stakeholders that the quality of education received by learners can vary across different models of learning, particularly 'non-traditional' models such as apprenticeships, employer-led routes, blended learning, and distance learning. We also

² [Frontiers | Students' perceptions and outcome of teacher feedback: a systematic review](#); [Differential Attainment in Summative Assessments within Postgraduate Medical Education & Training: 2020 Thematic Series on Tackling Differential Attainment in Healthcare Professions – ScienceOpen](#), [2024-improving-feedback-in-the-context-of-differential-attainment.pdf](#); [Closing the awarding gap: why an inclusive curriculum makes a difference to all students | Teaching & Learning - UCL – University College London](#); [SchneiderPreckel2017.pdf](#)

³ [Professional Standards Authority Standard 3 evidence matrix](#)

⁴ [Fair Admissions, Fair Decisions, and Fair Outcomes: An Analysis of Algorithmic Bias in Education, Employment, Healthcare, and Housing](#); [Screened out Onscreen: Disability Discrimination, Hiring Bias, and Artificial Intelligence](#); [Implications of AI \(un-\)fairness in higher education admissions | Proceedings of the 2020 Conference on Fairness, Accountability, and Transparency](#); [Automated Decision-Making Fairness in an AI-driven World: Public Perceptions, Hopes and Concerns: Key Findings](#)

know that there is increasing diversity in the available routes into a profession. We are proposing changes to the SETs relating to admissions (4.2, 4.3) and threshold qualifications (7.1) that may help to improve fair access to learning routes to registration; and changes to SETs regarding governance and management structures (2.1, 9.5) that may help to improve oversight of learner experience in all education settings.

35. The proposed changes also combine some existing SETs that have similar purposes but for different settings, so that the same SETs apply to all settings (6.1, 9.1, 9.2). These changes may help to improve consistency in the quality of education and training for all learners, regardless of their route into the profession.
36. These changes may positively impact outcomes and experiences for all groups. They may also reduce the risk of unfairness or discrimination to the learners, service users, or educators involved in programmes. This in turn, supports long-term improvements for patient safety and health outcomes.

Age (includes children, young people and older people)

37. Individuals can be at risk of encountering discrimination, harassment, or victimisation due to misconceptions or discriminatory attitudes regarding their age.⁵ We are proposing changes throughout the SETs that may help reduce the risks of age-related discrimination for learners, staff, or others involved in programmes.
38. These changes include highlighting fairness, safety, openness, collaboration, and evidence-based action as principles underpinning the SETs, updating guidance to emphasise the value of listening to feedback and drawing on a wide range of perspectives and evidence, and clarifying our expectations that equality, diversity, inclusion, and fairness are embedded in policies and strategies across the institution (2.2, 3.1, 4.1, 4.2, 4.3, 4.4, 7.2, 7.4, 8.3, 8.4, 8.5, 8.6) with the right structures and resources in place to support them (2.1, 2.4, 3.2, 3.3, 5.1, 6.1, 7.3, 9.1, 9.2, 9.5). These changes are intended to strengthen expectations that education providers challenge discrimination and deliver fair opportunities for learners to participate and succeed.
39. Some service users may be vulnerable in practice settings due to their age. We are proposing to strengthen the SETs about safety and consent (3.1, 3.4, 6.4, 6.5, 3.5), which may help to help reduce the risk of harm to service users involved in programmes.
40. Most programmes we approve are delivered to learners between the ages of 18 and 25. Research by the Office for Students (OfS) shows that this age range has a higher likelihood of experiencing sexual harassment or assault. This is discussed further in the section on sex.
41. Learners beginning tertiary study under the age of 18 (minors) may face barriers to enrolment on programmes and/or participating in placements and/or apprenticeships. Literature also found trends in learners' outcomes from apprenticeship programmes according to their age and socio-economic status.⁶ We are proposing changes to the SETs that may help improve experiences of learners undertaking less 'traditional' learning routes, such as apprenticeships, and that may improve consistency in access to and quality of learning in different settings.
42. These changes include strengthening expectations that there is regular monitoring and evaluation that enhances quality, safety, and fairness across all settings (2.3), sufficient

⁵ [Attitudes to ageing amongst health care professionals: a qualitative systematic review - PMC; Promoting Age Inclusivity in Higher Education: Campus Practices and Perceptions by Students, Faculty, and Staff | Research in Higher Education](#)

⁶ [A multi-institutional exploration of the social mobility potential of degree apprenticeships](#)

availability of practice-based learning to meet the needs of all learners (7.4), sufficient staff to deliver programmes (9.1), and that education providers maintain their overall responsibility for all settings through formal partnerships with delivery partners (9.5). We anticipate these proposals may improve oversight points across all settings and have a positive impact on learners' experience across delivery models.

43. OfS considers someone to be a 'mature student' if their age on entry to higher education is 21 years or over. OfS research suggests that mature learners tend to perform less well than younger students.⁷ Proposed changes to the SETs about improving outcomes and experiences for learners may help to address differential attainment for disadvantaged learners, such as mature students.
44. These changes include emphasising our expectations that insights gained from monitoring and evaluation processes are used to take actions towards improvements (2.3), ensuring that learners receive the necessary feedback to play a more active role in their development (5.6), and strengthening expectations that learners' needs are met (3.1, 3.2, 6.1, 7.3). This aligns with the Professional Standards Authority's (PSA) expectation that regulators develop and implement plans to reduce any identified unfair differential attainment in education and training.

Disability (includes physical and mental health conditions. Remember 'invisible disabilities')

45. Individuals can be at risk of encountering discrimination, harassment, or victimisation due to misconceptions, unconscious bias, or discriminatory attitudes regarding disability. We are proposing changes throughout the SETs that may help reduce the risks of disability-related discrimination for learners, staff, or others involved in programmes.
46. These changes include highlighting fairness, safety, openness, collaboration, and evidence-based action as principles underpinning the SETs, updating guidance to emphasise the value of listening to feedback and drawing on a wide range of perspectives and evidence, and clarifying our expectations that equality, diversity, inclusion, and fairness are embedded in policies and strategies across the institution (2.2, 3.1, 4.1, 4.2, 4.3, 4.4, 7.2, 7.4, 8.3, 8.4, 8.5, 8.6) with the right structures and resources in place to support them (2.1, 2.4, 3.2, 3.3, 5.1, 6.1, 7.3, 9.1, 9.2, 9.5). These changes are intended to strengthen expectations that education providers challenge discrimination and deliver fair opportunities for learners to participate and succeed.
47. Disabled people can also experience systemic barriers to accessing and succeeding in higher education and employment.⁸ Data from the OfS and the House of Commons suggests that disabled learners are more likely to leave higher education before they complete their course, and that outcomes are not the same for all disability types.⁹ Proposed changes to the SETs about improving outcomes and experiences for learners may help to address differential attainment for disadvantaged learners, such as disabled learners.
48. These changes include emphasising our expectations that insights gained from monitoring and evaluation processes are used to take actions towards improvements (2.3), ensuring

⁷ [A statistical overview of higher education in England - Office for Students](#)

⁸ [Inclusion of disabled Higher Education students: why are we not there yet? ; Full article: Higher education and disability: Exploring student experiences; University gatekeepers' use of the rhetoric of citizenship to relegate the status of students with disabilities in Canada; Ableism within health care professions: a systematic review of the experiences and impact of discrimination against health care providers with disabilities; Epistemic injustice, healthcare disparities and the missing pipeline: reflections on the exclusion of disabled scholars from health research; Inclusion and Belonging in Higher Education: A Scoping Study of Contexts, Barriers, and Facilitators; Barriers and Facilitators in the Transition From Higher Education to Employment for Students With Disabilities: A Rapid Systematic Review](#)

⁹ [A statistical overview of higher education in England - Office for Students; Equality of access and outcomes in higher education in England | House of Commons Library](#)

that learners receive the necessary feedback to play a more active role in their development (5.6), and strengthening expectations that learners' needs are met (3.1, 3.2, 6.1, 7.3). This aligns with the Professional Standards Authority's (PSA) expectation that regulators develop and implement plans to reduce any identified unfair differential attainment in education and training.

49. We are also proposing changes that may help improve accessibility in learning environments. These include adding the word 'accessible' to the SET about admissions processes (4.1), including references to accessibility in guidance for SETs relating to staff support, feedback and complaints processes, and learners and service users contributing to the programme, and updating the guidance for SETs about learning environments and practice-based learning to clarify expectations around adjustments or accommodations for disability and different access requirements. These changes may help improve accessibility and reduce barriers to participation for disabled learners, service users, and staff.
50. The word 'accessible' is included in the current wording of the SET relating to supporting learners' wellbeing and learning needs. Proposed changes to simplify the wording of this SET (3.2) and make it more outcome-focused mean that it no longer includes the word 'accessible', which may be perceived as decreasing expectations of accessibility. To address this, and ensure accessibility expectations remain intact, we are proposing to update the guidance to include an explicit expectation that the support systems or services to support learners' wellbeing and learning needs are accessible, safe, and person centred.
51. Insights from stakeholders and literature indicate that when learners require or seek reasonable adjustments to a programme, education providers may make a judgement on the learner's ability to join our Register based on the availability of similar adjustments in practice-based settings. This presents a risk if education providers use those judgements as the rationale to unfairly reject an applicant as part of admissions decisions or prevent a learner from completing a programme for being unable to meet the standards of proficiency (SOPs).¹⁰
52. We propose updating guidance about admissions, appropriate teaching, learning, and assessment methods, and ensuring learners who complete the programme can meet the standards of proficiency, to clarify education providers' role and obligations regarding reasonable adjustments and equity and diversity laws, and how these interact with the standards of proficiency. This may help to facilitate appropriate support for disabled learners during their learning and help enable fairer and more informed decisions about undertaking a programme. The guidance is intended to help reduce the risk of the SETs being misinterpreted to impose unnecessary or unfair barriers to participation and progress for disabled learners.
53. We also heard from stakeholders that there can be challenges ensuring that certain policies or standards, such as reasonable adjustments, are implemented or upheld in external environments like practice-based settings. Proposed changes to the SETs relating to delivery partners (2.1, 9.5) are intended to clarify and strengthen expectations of formal partnerships between education providers and programme delivery partners that ensure the education provider's overall responsibility for the programme. We also propose complementary guidance that highlights expectations in relation to reasonable adjustments.

¹⁰ [University gatekeepers' use of the rhetoric of citizenship to relegate the status of students with disabilities in Canada; The experience of disabled and non-disabled students on professional practice placements in the United Kingdom; Full article: Experiences of higher education for students with chronic illnesses; Disability and omnicompetence: facing up to the challenges in the training of veterinary practitioners; 'I have something to contribute to working life' – students with disabilities showcasing employability while on practical placement](#)

These changes may have a positive impact on the provision of reasonable adjustments across education settings.

54. We know that some service users may be vulnerable in practice settings due to disability. We are proposing to strengthen the SETs about safety and consent (3.1, 3.4, 6.4, 6.5, 3.5), which may help to help reduce the risk of harm to service users involved in programmes.
55. Proposed changes to the SET about ensuring learners can maintain service user safety (3.4) may also have positive impacts for disabled learners. The proposed wording clarifies the purpose of considering learners' ongoing health by emphasising the focus on service user safety, which may help to reduce the risk of the standard being misinterpreted and creating unfair or unnecessary barriers for learners with a disability or long-term health condition to successfully complete a programme. We also propose complementary guidance to clarify expectations around health requirements at admissions.
56. Learners and staff with disabilities or long-term health conditions may be impacted differently by policies around absences, exemptions, or extenuating circumstances.¹¹ We are proposing updated guidance for SETs relating to attendance, assessments, and supporting learner needs, which may help to reduce the risk of these policies creating systemic barriers or disadvantage.
57. Insights from the literature and the expert panels suggest that technologies, such as AI tools, can have different impacts for neurodiverse learners, both positive and negative.¹² We are proposing two new SETs relating to determining and clearly communicating appropriate use of different technologies in programmes (5.5) and educators being up to date with relevant technologies and tools (9.3)—as well as strengthening expectations that the integration of new technologies in programmes considers the potential impacts for different groups (8.10), both positive or negative. These changes may help to reduce the risks of inadvertent negative impacts when using or adopting new tools and technologies, as well as help to future-proof the standards and enable opportunities for innovation to improve experiences for different groups, such as neurodiverse learners.

Marriage and civil partnerships (includes same-sex unions)

58. Individuals can be at risk of encountering discrimination, harassment, or victimisation due to misconceptions or discriminatory attitudes regarding their marriage or civil partnership. We are proposing changes throughout the SETs that may help reduce the risks of discrimination related to relationship status for learners, staff, or others involved in programmes.
59. These changes include highlighting fairness, safety, openness, collaboration, and evidence-based action as principles underpinning the SETs, updating guidance to emphasise the value of listening to feedback and drawing on a wide range of perspectives and evidence, and clarifying our expectations that equality, diversity, inclusion, and fairness are embedded in policies and strategies across the institution (2.2, 3.1, 4.1, 4.2, 4.3, 4.4, 7.2, 7.4, 8.3, 8.4, 8.5, 8.6) with the right structures and resources in place to support them (2.1, 2.4, 3.2, 3.3, 5.1, 6.1, 7.3, 9.1, 9.2, 9.5). These changes are intended to strengthen expectations that education providers challenge discrimination and deliver fair opportunities for learners to participate and succeed.

¹¹ [View of From Policy to Practice: Trauma-Informed Approaches to Student Attendance](#)

¹² [Designing Teaching Strategies Using Artificial Intelligence for Neurodivergent Students in Higher Education; AI Wizards: Pioneering Assistive Technologies for Higher Education Inclusion of Students with Learning Disabilities; AI Detection's High False Positive Rates and the Psychological and Material Impacts on Students](#)

60. Learners or staff may be impacted differently by policies around absences, exemptions, or extenuating circumstances, depending on their relationship status and recognition of any long-term partnership.¹³ We are proposing updated guidance for SETs relating to attendance, assessments, and supporting learner needs, which may help to reduce the risk of these policies creating systemic barriers or disadvantage.

Pregnancy and maternity (includes people who are pregnant, expecting a baby, up to 26 weeks post-natal or are breastfeeding)

61. Individuals can be at risk of encountering discrimination, harassment, or victimisation due to misconceptions or discriminatory attitudes regarding their pregnancy, status as expectant parents, or having recently given birth. We are proposing changes throughout the SETs that may help reduce the risks of discrimination related to pregnancy or maternity for learners, staff, or others involved in programmes.

62. These changes include highlighting fairness, safety, openness, collaboration, and evidence-based action as principles underpinning the SETs, updating guidance to emphasise the value of listening to feedback and drawing on a wide range of perspectives and evidence, and clarifying our expectations that equality, diversity, inclusion, and fairness are embedded in policies and strategies across the institution (2.2, 3.1, 4.1, 4.2, 4.3, 4.4, 7.2, 7.4, 8.3, 8.4, 8.5, 8.6) with the right structures and resources in place to support them (2.1, 2.4, 3.2, 3.3, 5.1, 6.1, 7.3, 9.1, 9.2, 9.5). These changes are intended to strengthen expectations that education providers challenge discrimination and deliver fair opportunities for learners to participate and succeed.

63. Learners and staff who are pregnant or have recently given birth may be impacted differently by policies around absences, exemptions, or extenuating circumstances in relation to physical mobility, restrictions on activities, or increased absences for medical reasons.¹⁴ We are proposing updated guidance for SETs relating to attendance, assessments, and supporting learner and staff needs, which may help to reduce the risk of these policies creating systemic barriers or disadvantage.

64. Proposed changes to emphasise accessibility in SETs relating to suitable learning environments (3.1, 5.1, 7.4) may also have positive impacts for learners and staff who are pregnant or have recently given birth.

65. Some service users may be vulnerable in practice settings if they are pregnant or have recently given birth. We are proposing to strengthen the SETs about safety and consent (3.1, 3.4, 6.4, 6.5, 3.5), which may help to help reduce the risk of harm to service users involved in programmes.

Race (includes nationality, citizenship, ethnic or national origins)

66. Individuals can be at risk of encountering discrimination, harassment, or victimisation due to misconceptions or discriminatory attitudes regarding their ethnicity, race, or nationality. These risks can also overlap with those experienced by migrants, international students, and refugees.¹⁵ We are proposing changes throughout the SETs that may help reduce the risks of racial discrimination for learners, staff, or others involved in programmes.

¹³ [View of From Policy to Practice: Trauma-Informed Approaches to Student Attendance](#)

¹⁴ [View of From Policy to Practice: Trauma-Informed Approaches to Student Attendance](#); [Pregnancy Discrimination in Higher Education](#)

¹⁵ [The super-disadvantaged in higher education: barriers to access for refugee background students in England](#); [\(In\)validation and \(mis\)recognition in higher education: the experiences of students from refugee backgrounds](#); [UK University Initiatives Supporting Forced Migrants](#); [The Neglected Minority: Higher Education Opportunities for Refugee](#)

67. These changes include highlighting fairness, safety, openness, collaboration, and evidence-based action as principles underpinning the SETs, updating guidance to emphasise the value of listening to feedback and drawing on a wide range of perspectives and evidence, and clarifying our expectations that equality, diversity, inclusion, and fairness are embedded in policies and strategies across the institution (2.2, 3.1, 4.1, 4.2, 4.3, 4.4, 7.2, 7.4, 8.3, 8.4, 8.5, 8.6) with the right structures and resources in place to support them (2.1, 2.4, 3.2, 3.3, 5.1, 6.1, 7.3, 9.1, 9.2, 9.5). These changes are intended to strengthen expectations that education providers challenge discrimination and deliver fair opportunities for learners to participate and succeed.
68. We are also proposing changes that may help reduce the risk of racial discrimination or other harm experienced by service users in programmes, including strengthening the SETs about safety and consent (3.1, 3.4, 6.4, 6.5, 3.5).
69. We know that race and ethnicity can have an impact on learners' outcomes and experiences in education and training. We know from work on differential attainment in UK programmes of education that White learners are less likely than any other ethnic groups to attend university, but those who do attend higher education tend to perform better and are less likely to drop out than other ethnic groups.¹⁶ This aligns with research which has shown that non-White learners are at higher risk of experiencing racism and other barriers due to ethnic or cultural differences, in both health and care settings and in education.¹⁷ Proposed changes to the SETs about improving outcomes and experiences for learners may help to address differential attainment for learners of different ethnic groups.
70. These include emphasising our expectations that insights gained from monitoring and evaluation processes are used to take actions towards improvements (2.3), ensuring that learners receive the necessary feedback to play a more active role in their development (5.6), and strengthening expectations that learners' needs are met (3.1, 3.2, 6.1, 7.3). This aligns with the Professional Standards Authority's (PSA) expectation that regulators develop and implement plans to reduce any identified unfair differential attainment in education and training.
71. Learners and staff from different cultural backgrounds or nationalities may be impacted differently by policies around absences, exemptions, or extenuating circumstances. For example, conceptions of who is close family member, needing to travel overseas, or different practices around significant events like births, deaths, or marriages.¹⁸ We are proposing updated guidance for SETs relating to attendance, assessments, and supporting learner needs, which may help to reduce the risk of these policies creating systemic barriers or disadvantage.
72. Literature suggests differences in proportions of learners from different ethnic groups in different models of learning, which may be due to different barriers to entry for 'non-traditional' models such as degree apprenticeships compared to more traditional models of

[Background Students in England and Poland](#); [International tourism and racism](#); [A Modern Guide to Refugee Education: Comparative Perspectives and Innovative](#)

¹⁶ [Equality of access and outcomes in higher education in England - House of Commons Library](#); [Undergraduate degree results - GOV.UK Ethnicity facts and figures](#); [A statistical overview of higher education in England - Office for Students](#)

¹⁷ [Exploring BAME Student Experiences in Healthcare Courses in the United Kingdom: A Systematic Review](#); [Racial Microaggressions, Racial Battle Fatigue, and Racism-Related Stress in Higher Education](#); ['Getting in, getting on, getting out': Black, Asian and Minority Ethnic staff in UK higher education](#); ["To tell you the truth I'm tired": a qualitative exploration of the experiences of ethnically diverse NHS staff](#); [The post-racial myth: rethinking Chinese university students' experiences and perceptions of racialised microaggressions in the UK](#); ['Where are you really from?': a qualitative study of racial microaggressions and the impact on medical students in the UK | BMJ Open](#)

¹⁸ [View of From Policy to Practice: Trauma-Informed Approaches to Student Attendance](#)

learning.¹⁹ We have proposed changes to the SETs to reflect the complexity of modern programme delivery, particularly where education is delivered in partnership with employers or across multiple sites. This may positively impact the experiences of learners in 'non-traditional' routes.

73. Literature highlights a risk that work to implement improvements and reduce discrimination in organisations can be disproportionately carried by staff from minority groups when it is not part of their role, and often without appropriate compensation for their time or resource—which can create increased pressure and stress at work.²⁰ Proposed updates to the guidance about monitoring, evaluating, and enhancing programmes, embedding EDI across all settings, and supporting staff needs are intended to clarify expectations around appropriate resourcing and support to identify and implement improvements. This may help reduce the risk of staff being unfairly overburdened.
74. Learners who have recently moved to the UK or completed some of their previous study overseas—such as migrants, refugees, or international students—may encounter administrative challenges with assessment of their previous study, qualifications, work experience, or criminal record if systems are not set up to accept non-UK documents or evidence. We are proposing changes to SETs relating to admissions (4.1, 4.3), and the associated guidance, to emphasise fairness and strengthen our expectations that admissions processes are accessible to applicants who may have non-typical documents or evidence required for admissions assessment.
75. Learners whose first language is not English, or who completed their previous study overseas, are more likely to be impacted by the SET relating to English language proficiency (4.4). The proposed changes to this SET retain the existing expectations around ensuring sufficient levels of English language proficiency, while emphasising expectations of fairness in these assessments and aligning the wording with the language used in applications to the Register through the international route.
76. Insights from the literature and the expert panels suggest that technologies, such as AI tools, can have more significant impacts for learners whose first language is not English—both positive and negative.²¹ We are proposing two new SETs relating to determining and clearly communicating appropriate use of different technologies in programmes (5.5) and educators being up to date with relevant technologies and tools (9.3)—as well as strengthening expectations that the integration of new technologies in programmes considers the potential impacts for different groups (8.10), both positive or negative. These changes may help to reduce the risks of inadvertent negative impacts when using or adopting new tools and technologies, as well as to help to future-proof the standards and enable opportunities for innovation to improve experiences for different groups, such as learners whose first language is not English.

¹⁹ [A multi-institutional exploration of the social mobility potential of degree apprenticeships](#); [How employers are rising to the 20% challenge: increasing the uptake of degree apprentices from Black, Asian and Minority Ethnic backgrounds - ProQuest](#)

²⁰ [Addressing disparities in academic medicine: what of the minority tax? | BMC Medical Education | Full Text](#); [Diversity and inclusion in UK Higher Education: staff perspectives on institutional representations and their reality](#); [Time Tax Put On Scientists of Colour](#); [Tackling the Minority Tax: A Roadmap to Redistributing Engagement in Diversity, Equity, and Inclusion Initiatives, 2022](#); [The burden of service for faculty of color to achieve diversity and inclusion: the minority tax](#); [Workplace experiences of LGBTQIA+ trainees, staff, and faculty in academic psychology, psychiatry, and neuroscience departments](#)

²¹ [AI Detection's High False Positive Rates and the Psychological and Material Impacts on Students](#); [Health professions school applicant experiences of discrimination during interviews](#)

Religion or belief (includes religious and philosophical beliefs, including lack of belief)

77. Individuals can be at risk of encountering discrimination, harassment, or victimisation due to misconceptions or discriminatory attitudes regarding their religion or belief. Literature has particularly focused on the experiences of Muslim learners and practitioners.²² We are proposing changes throughout the SETs that may help reduce the risks of discrimination related to religion or belief for learners, staff, or others involved in programmes.
78. These changes include highlighting fairness, safety, openness, collaboration, and evidence-based action as principles underpinning the SETs, updating guidance to emphasise the value of listening to feedback and drawing on a wide range of perspectives and evidence, and clarifying our expectations that equality, diversity, inclusion, and fairness are embedded in policies and strategies across the institution (2.2, 3.1, 4.1, 4.2, 4.3, 4.4, 7.2, 7.4, 8.3, 8.4, 8.5, 8.6) with the right structures and resources in place to support them (2.1, 2.4, 3.2, 3.3, 5.1, 6.1, 7.3, 9.1, 9.2, 9.5). These changes are intended to strengthen expectations that education providers challenge discrimination and deliver fair opportunities for learners to participate and succeed.
79. Learners and staff with different religions or beliefs may be impacted differently by policies around absences, exemptions, or extenuating circumstances. For example, if learning activities or assessment schedules conflict with religious observances such as significant holidays or periods of rest, fasting, or prayer.²³ We are proposing updated guidance for SETs relating to attendance, assessments, and supporting learner needs, which may help to reduce the risk of these policies creating systemic barriers or disadvantage.
80. Some service users may be vulnerable in practice settings due to their religion or belief. We are proposing to strengthen the SETs about safety and consent (3.1, 3.4, 6.4, 6.5, 3.5), which may help to reduce the risk of harm to service users involved in programmes.

Sex (includes men and women)

81. Individuals can be at risk of encountering discrimination, harassment, or victimisation due to misconceptions or discriminatory attitudes regarding their sex. In fields that are more male-dominated or female-dominated, those whose sex is less represented in the profession are more likely to be disadvantaged or have negative experiences due to their sex. The majority of HCPC registrants are female, with some professions being more significantly female-dominated; and 2023 statistics suggest that the majority of staff in UK HEIs are female, with health subjects showing the highest proportion of female academic staff).²⁴ Therefore, male learners and staff are more likely to be in the minority in education and training settings relating to HCPC-regulated professions. Most research focuses on the experiences of women in male-dominated environments and there is comparatively less research on the experience of men in female-dominated environments. But research comparing the experiences of both groups suggests that while the experiences are different for men and women, each group encounters difficulties and prejudice.²⁵ We are proposing

²² [Denial of Islamophobia is harming Muslim doctors in the NHS](#); [Protecting Religion and Belief on Campus: A Case Study of Muslim Students in Three Universities in England](#); [Discrimination, harassment and non-reporting in UK medical education](#); [Religion and belief in health and social care: the case for religious literacy](#); [Religion and higher education : making sense of the experience of religious students at secular universities through a Bourdieuan lens](#)

²³ [View of From Policy to Practice: Trauma-Informed Approaches to Student Attendance](#); [Shabbat and Shattered Dreams: Religious Accommodations for Public Exams in South Korea | Journal of Law and Religion | Cambridge Core](#); [Religious observance accommodation in Ontario universities](#)

²⁴ [Diversity data | The HCPC](#); [Equality in higher education: statistical reports 2023 | Advance HE](#)

²⁵ [Comparison within gender and between female and male leaders in female-dominated, male-dominated and mixed-gender work environments](#); [Women and Men in Conflicting Social Roles: Implications from Social Psychological Research](#)

changes throughout the SETs that may help reduce the risks of discrimination related to sex for learners, staff, or others involved in programmes.

82. These changes include highlighting fairness, safety, openness, collaboration, and evidence-based action as principles underpinning the SETs, updating guidance to emphasise the value of listening to feedback and drawing on a wide range of perspectives and evidence, and clarifying our expectations that equality, diversity, inclusion, and fairness are embedded in policies and strategies across the institution (2.2, 3.1, 4.1, 4.2, 4.3, 4.4, 7.2, 7.4, 8.3, 8.4, 8.5, 8.6) with the right structures and resources in place to support them (2.1, 2.4, 3.2, 3.3, 5.1, 6.1, 7.3, 9.1, 9.2, 9.5). These changes are intended to strengthen expectations that education providers challenge discrimination and deliver fair opportunities for learners to participate and succeed.
83. Data from OfS and the Higher Education Statistics Agency indicates that men are less likely to go to university and are less likely to perform well—and in subjects allied to medicine, significantly more female learners have enrolled and obtained qualifications in the UK in the past five years.²⁶ Proposed changes to the SETs about improving outcomes and experiences for learners may help to address differential attainment for disadvantaged learners, such as male learners in allied health courses.
84. These changes include emphasising our expectations that insights gained from monitoring and evaluation processes are used to take actions towards improvements (2.3), ensuring that learners receive the necessary feedback to play a more active role in their development (5.6), and strengthening expectations that learners' needs are met (3.1, 3.2, 6.1, 7.3). This aligns with the Professional Standards Authority's (PSA) expectation that regulators develop and implement plans to reduce any identified unfair differential attainment in education and training.
85. Research by OfS on sexual misconduct in universities and colleges shows that those between the ages of 18 and 24 are significantly more likely to have experienced sexual harassment or assault in the last year, which correlates strongly with the age of most learners in higher education.²⁷ Gender/sex is significant in relation to this, with women being more likely to be the victims of sexual harassment and assault, and men more likely to be perpetrators. We are proposing several changes to the SETs that may help to reduce the risks of sexual harassment or assault.
86. These changes include broadening the SET relating to safe and supportive learning environments (3.1) to include all those involved in a programme, separating the SET about obtaining consent into two distinct SETs about consent from learners (6.5) and service users and carers (6.4), strengthening guidance relating to learner complaints, and adding explicit reference to safety in SETs relating to monitoring and evaluation (2.3), admissions (4.4), and overall professional responsibility for programmes (2.4).
87. Some service users may also be vulnerable in practice settings due to their sex, as there is a gendered element to the likelihood of perpetrating or being the victim of inappropriate or unwanted physical touch and similar types of sexual harassment in health and care settings. We are proposing to strengthen the SETs about safety and consent (3.1, 3.4, 6.4, 6.5, 3.5), which may help to help reduce the risk of harm to service users involved in programmes.

²⁶ [A statistical overview of higher education in England; What are HE students' progression rates and qualifications?](#)

²⁷ [Tackling sexual misconduct in universities and colleges - Office for Students](#)

Gender reassignment (consider that individuals at different stages of transition may have different needs)

88. Individuals who are intersex, non-binary, or whose gender identity does not match their sex recorded at birth can be at risk of encountering discrimination, harassment, or victimisation due to misconceptions or discriminatory attitudes regarding their gender reassignment status. We are proposing changes throughout the SETs that may help reduce the risks of discrimination related to gender reassignment for learners, staff, or others involved in programmes.
89. These changes include highlighting fairness, safety, openness, collaboration, and evidence-based action as principles underpinning the SETs, updating guidance to emphasise the value of listening to feedback and drawing on a wide range of perspectives and evidence, and clarifying our expectations that equality, diversity, inclusion, and fairness are embedded in policies and strategies across the institution (2.2, 3.1, 4.1, 4.2, 4.3, 4.4, 7.2, 7.4, 8.3, 8.4, 8.5, 8.6) with the right structures and resources in place to support them (2.1, 2.4, 3.2, 3.3, 5.1, 6.1, 7.3, 9.1, 9.2, 9.5). These changes are intended to strengthen expectations that education providers challenge discrimination and deliver fair opportunities for learners to participate and succeed.
90. Similarly, some service users may be vulnerable in practice settings due to their gender reassignment status. We are proposing to strengthen the SETs about safety and consent (3.1, 3.4, 6.4, 6.5, 3.5), which may help to help reduce the risk of harm to service users involved in programmes.
91. Learners and staff in different stages of gender reassignment may be impacted by policies around absences, exemptions, or extenuating circumstances in relation to gender-affirming medical treatments.²⁸ We are proposing updated guidance for SETs relating to attendance, assessments, and supporting learner needs, which may help to reduce the risk of these policies creating systemic barriers or disadvantage.

Sexual orientation (includes heterosexual, lesbian, gay, bisexual, queer and other orientations)

92. Individuals can be at risk of encountering discrimination, harassment, or victimisation due to misconceptions or discriminatory attitudes regarding their sexual orientation.²⁹ We are proposing changes throughout the SETs that may help reduce the risks of discrimination related to sexual orientation for learners, staff, or others involved in programmes.
93. These changes include highlighting fairness, safety, openness, collaboration, and evidence-based action as principles underpinning the SETs, updating guidance to emphasise the value of listening to feedback and drawing on a wide range of perspectives and evidence, and clarifying our expectations that equality, diversity, inclusion, and fairness are embedded in policies and strategies across the institution (2.2, 3.1, 4.1, 4.2, 4.3, 4.4, 7.2, 7.4, 8.3, 8.4, 8.5, 8.6) with the right structures and resources in place to support them (2.1, 2.4, 3.2, 3.3, 5.1, 6.1, 7.3, 9.1, 9.2, 9.5). These changes are intended to strengthen expectations that education providers challenge discrimination and deliver fair opportunities for learners to participate and succeed.
94. Some learners or service users may be vulnerable in practice settings due to their sexual orientation. We are proposing to strengthen the SETs about safety and consent (3.1, 3.4,

²⁸ [View of From Policy to Practice: Trauma-Informed Approaches to Student Attendance](#)

²⁹ [Challenges of Lesbian, Gay, Bisexual, Transgender, Queer, Intersex, and Asexual \(LGBTQIA\) Students in Higher Education](#)

6.4, 6.5, 3.5), which may help to help reduce the risk of harm to service users involved in programmes.

Other identified groups

Socio-economic disadvantage and lower income.

95. OfS considers learners from low socio-economic backgrounds and deprived areas to be a disadvantaged group, and a House of Commons briefing indicates a pattern of learners from areas with higher levels of deprivation being more likely to drop out of university.³⁰ Proposed changes to the SETs about improving outcomes and experiences for learners may help to address differential attainment for disadvantaged learners, such as those with fewer financial resources or from low socio-economic backgrounds.
96. These changes include emphasising our expectations that insights gained from monitoring and evaluation processes are used to take actions towards improvements (2.3), ensuring that learners receive the necessary feedback to play a more active role in their development (5.6), and strengthening expectations that learners' needs are met (3.1, 3.2, 6.1, 7.3). This aligns with the Professional Standards Authority's (PSA) expectation that regulators develop and implement plans to reduce any identified unfair differential attainment in education and training.
97. Learners with lower income or fewer financial resources are more likely to be impacted by costs associated with programmes, particularly unanticipated or out-of-pocket costs. We are proposing updated guidance relating to admissions, meeting learner needs, and the accessibility of resources to support learning about considering financial barriers to access and communicating expected costs and financial implications of undertaking a programme. This is intended to have positive impacts for learners from low socio-economic backgrounds where cost and affordability pose a barrier to access, and help to reduce the risks of learners encountering unexpected financial barriers after commencing a programme.
98. Learners, service users, and carers may also experience barriers to contributing to programmes due to socio-economic pressures. We are proposing updates to the guidance for SETs relating service users, carers, and learners being involved in programme design and evaluation, which may have a positive impact on the risk of financial barriers to participation in these processes.
99. Stakeholders highlighted possible risks when the number of places on programmes outstrip employer demand, leading to limited employment opportunities and high competition for jobs. These impacts may be more significant for learners with lower income or socio-economic disadvantage. We are proposing changes to SETs relating to the financial sustainability of programmes (1.1) and the availability and capacity of practice-based learning (7.4). These changes may help reduce the risks of learners being put at financial risk.
100. The expert panels discussed the significance of socio-economic status or income as a factor in decisions about which model of learning to undertake, i.e. more traditional courses or earn-and-learn routes like paid employment-based programmes or apprenticeships, and the possible impacts of this on outcomes for these learners due to differences in learning experiences between models of learning. Proposed changes about improving oversight and aligning expectations of learner experience in all education settings (2.1, 2.3, 6.1, 9.1, 9.2, 9.5) may help ensure that learners receive the same quality of learning and support in all settings, regardless of the method of learning they are undertaking.

³⁰ [Equality of access and outcomes in higher education in England | House of Commons Library](#)

Caring responsibilities (includes those with young children or caring for a relative)

101. Learners and staff with caring responsibilities may be impacted by policies around absences, exemptions, or extenuating circumstances in relation to gender-affirming medical treatments.³¹ We are proposing updated guidance for SETs relating to attendance, assessments, and supporting learner needs, which may help to reduce the risk of these policies creating systemic barriers or disadvantage.

Care experience (includes foster care, residential children's homes, adoption, supported accommodation or secure units, and kinship care or informal care arrangements)

102. OfS considers care-experienced learners a disadvantaged group and literature shows connections between experience in care and lower educational outcomes and lower continuation rates.³² Proposed changes to the SETs about improving outcomes and experiences for learners may help to address differential attainment for disadvantaged learners, such as those with care experience.

103. These changes include emphasising our expectations that insights gained from monitoring and evaluation processes are used to take actions towards improvements (2.3), ensuring that learners receive the necessary feedback to play a more active role in their development (5.6), and strengthening expectations that learners' needs are met (3.1, 3.2, 6.1, 7.3). This aligns with the Professional Standards Authority's (PSA) expectation that regulators develop and implement plans to reduce any identified unfair differential attainment in education and training.

Four countries diversity

104. Differences in local laws and legislation in the four countries create different environments for providers in different UK countries. Beyond this, it is not expected that the changes proposed will impact any one of the four countries differently.

Section 4: Welsh Language Standards

What effects does this policy have on opportunities for persons to use the Welsh language and engage with our commitments under the Welsh Language Standards?

105. It is not expected that the proposed changes will impact opportunities to use the Welsh language or engage with our commitments under the Welsh Language Standards.

How does this policy treat the Welsh language no less favourably than the English language?

106. The consultation documents and updated standards will be available in Welsh and English.

³¹ [View of From Policy to Practice: Trauma-Informed Approaches to Student Attendance](#); [Student carer experiences of higher education and support: a scoping review](#); [The Identification of Student Carers and the Burden of Their Caring Responsibilities on Academic Engagement and Student Life](#); [‘Little islands’: challenges and opportunities for student carers in higher education](#)

³² [Patterns of participation in higher education for care-experienced students in England: why has there not been more progress?](#); [Resilience, higher education and widening participation: generating change for care experienced students](#); [‘It was me, but it was them that helped me’: Exploring the issues for care experienced young people within higher education](#)