

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: 3

What are the intended outcomes of this work?

1. The intended outcome of this work is to have standards of education and training (SETs) that are fit for purpose and appropriately aligned to the standards of proficiency (SOPs) and the standards of conduct, performance and ethics (SCPEs). We conduct regular reviews of our standards 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—which, in turn, protects the integrity and reputation of the profession, and protects the public.
3. The upcoming changes to the SETs, which are the subject of this Equality Impact Assessment (EIA), follow a review of the existing SETs which have been in effect since 2017. The review was conducted from 2024-2026 and included public engagement and consultation on proposed changes, which informed the development of the finalised changes for Council approval. The changes are intended to ensure that the standards effectively fulfil their purpose, are up to date with health and care practice, and are easy to navigate and understand by the intended audiences.
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, must meet the standards of education and training (SETs). Therefore, changes to the SETs will have significant impact for education providers. For example, changes may require amendments to institution policies, governance structures, approaches to monitoring and evaluation, internal processes and procedures, and the support provided to learners and others involved in programmes.

6. There will be impacts for learners, as the purpose of the SETs is to ensure that learners receive effective and high-quality education and training. Changes to the SETs relating to staffing (2.4, 3.3, 6.1, 6.2, 9.2-9.4) and programme design and delivery (8.1-8.10, 9.1, 9.5) will influence the content and quality of the education and training that learners receive. Changes to the SETs relating to safety and support in the learning environment (3.1, 3.2), expectations for ensuring service user safety (3.4, 3.5, 6.4), admissions processes (4.1-4.3, 7.5), communication of information and expectations from education providers (5.1-5.5), and learners receiving or providing feedback (5.6, 6.6, 6.7) may impact learners' experiences and interactions with their institutions. It is helpful for learners to understand the changes so that they know what to expect from their education providers and how to raise a concern if the standards are not being met.
7. Professional bodies have a role in ensuring high standards, aligning educational requirements, and advocating for their members. The changes to the SETs, particularly those related to programme content and structure (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, or manage the operational and resource implications of certain changes to the SETs.
8. Faculty and staff involved in the creation, delivery, or assessment of education and training programmes will need to keep apprised of the changes to the SETs so that they can ensure they are meeting and applying the standards appropriately. For example, changes to the SETs relating to methods of teaching or assessment (5.6, 6.3, 6.6, 8.1-8.10) and applying and monitoring institution policies and processes (2.2, 2.3, 3.4, 3.5, 4.1-4.3, 5.1-5.5, 6.7, 7.2, 7.5) will influence how educators and other staff perform their roles. standards relating to resourcing and governance structures (1.1, 2.1, 9.1), staff appointments and qualifications (2.4, 6.1, 6.2, 9.2-9.5), 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. 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, research and resources about discrimination in the

workplace and education settings, research on racially and religiously motivated discrimination in healthcare,¹ 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 (including a public consultation), 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, and each stage of the review 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
 - g. Trade unions
 - h. Professional regulators
 - i. Public bodies
18. External stakeholder activities so far include:
 - Seeking feedback on the current SETs and proposed changes from existing HCPC forums for external stakeholders such as the professional bodies' quarterly forum and EDI forum.
 - A public consultation on proposed changes, open to submissions from anyone and supported by a communications and engagement plan to encourage engagement from education providers, employers, learners, and professional bodies. We received 197 responses.
 - Workshops for education providers and members of the public explaining the consultation process and key themes of the proposed changes, to encourage and support submissions to the consultation.
 - Inviting professional bodies to seek individual meetings to discuss specific concerns or questions about the SETs review.

¹ Including the [Lord Mann review of antisemitism and other forms of racism in the NHS and healthcare regulatory system](#).

- Pre-consultation 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.
 - Pre-consultation 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 each met five times between February and December 2025 to contribute to the development of the review and both the proposed and finalised changes to the SETs.
 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 informed development of the changes.
 21. We have been engaging with the HCPC's Education and Training Committee (ETC) and Council throughout the review as part of our governance process.

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)

22. 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. To highlight this more explicitly, we have added a new introduction to the SETs, which includes high-level expectations of education providers in relation to equality, as well as other core values underpinning the SETs. Equality is most prevalent in the principle of person-centred education, but also in seeking diverse perspectives, challenging assumptions, and working in partnership.
23. We know that good practice for EDI in education and training helps to deliver fairer outcomes and to 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. We have strengthened and expanded the SETs relating to EDI strategies and policies (2.2, 7.2) to emphasise that EDI should not just be present in standalone EDI policies but

embedded throughout all strategies and policies. One of these standards was also moved to programme level, to help 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.

24. There are also strengthened expectations that programmes keep up to date with evolving best practice (8.8) which includes best practice for EDI, and that monitoring and evaluation processes are used to enhance fairness and quality (2.3). These changes respond to feedback from stakeholders that while data collection is valuable, it is most meaningful when followed by action. Literature supports that the value of data and evidence lies in its application, and suggests that a diverse range of information sources, skilled data leadership, and a structured approach to turning insights into action can enable education providers to make effective changes towards equality and wellbeing.²
25. Changes to SETs about monitoring programme quality, involving learners and service users, and responding to complaints (2.3, 6.3, 6.6, 6.7) strengthen expectations that providers are proactively using relevant data to take meaningful actions towards improvement in programme quality and learner experiences. This is further supported by more explicit emphasis on regularly reviewing curricula and policies relating to EDI and technology use to ensure they remain up to date (2.2, 5.5, 7.2, 8.8). This is complemented by the principle of 'evidence-based and action-orientated' in the introduction, and it can be further supported by updates to the guidance emphasising the importance of seeking and effectively utilising a wide range of evidence and insights from different perspectives to make improvements. These changes aim to help education providers to identify and reduce systemic barriers and increase fairness and inclusion.
26. The new standard about providing timely and meaningful feedback to learners (5.6) aims to help improve the evidence and information that learners receive about their own learning, and to enable and empower them to have a more active role in their development. Research indicates that quality of feedback is strongly linked to student achievement, and it suggests that inequalities in the provision of timely and meaningful feedback may contribute to differential attainment.³ This new standard is intended to have positive impacts for all learners and to help 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.⁴
27. We heard from stakeholders that some staff can feel uncomfortable or unconfident around EDI matters, and that there is not always the adequate time, encouragement, or support provided for them to upskill. It was also raised that this discomfort or lack of experience can lead to other staff members being disproportionately given responsibilities relating to EDI based on their perceived identity or level of comfort with EDI matters, rather than their role. Changes to the SETs about learner support (3.1, 3.2, 7.3) and the new standard about supporting staff (3.3) emphasise the importance of meeting the needs of those involved in programmes to enable equal, inclusive, and high-quality education. This can be further

² [Data-driven success: Leveraging evidence-based strategies in higher education](#), [Misconceptions about data-based decision making in education: An exploration of the literature](#)

³ [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](#), [Improving Feedback in the Context of Differential Attainment](#); [Closing the awarding gap: why an inclusive curriculum makes a difference to all students](#); [Variables Associated with Achievement in Higher Education: A Systematic Review of Meta-Analyses](#).

⁴ [Professional Standards Authority Standard 3 evidence matrix](#).

supported by updates to the guidance for standards about staff competencies (2.4, 6.1, 9.2, 9.3) to clarify our expectations that all educators and other staff involved in programmes have sufficient skills and knowledge around EDI as appropriate to their role, to adequately support the needs of all learners.

28. To further highlight expectations of fairness in education and training, the word 'fair' has been added to the wording of SETs relating to monitoring (2.3), admissions (4.1-4.3, 7.5), staff appointments (2.4), and assessments (8.6), as well as references to fairness as a principle underpinning the SETs in the introduction. This can be further supported by updates to the guidance to highlight the risk of bias in these processes—through the individuals involved in the processes, as well as any tools being used. 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.⁵ The new standards about appropriate skills and use of technology (5.5, 9.4) are intended to help reduce the risks of uninformed technology use or the use of biased information or tools contributing to unfair, discriminatory practices.
29. Literature has indicated differences in inclusion and support for staff in different positions within higher education.⁶ The new SET about staff wellbeing (3.3) and changes to SETs about embedding principles of EDI and safe learning environments (2.2, 3.1) use the terminology 'staff and others involved in programmes' to emphasise that the expectations apply to all staff, such as non-academic staff and those on fixed-term contracts.
30. 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 know that there is increasing variety in the available routes into a profession, and research suggests that non-traditional routes like apprenticeships can both increase opportunities and present barriers for disadvantaged groups.⁷ Changes to the SETs relating to admissions (4.1, 4.2, 7.5) and the academic level of the programme (7.1) aim to improve fair access to learning routes to registration; and changes to strengthen the SETs regarding programme monitoring, access to practice-based learning, and governance and management structures (2.1, 2.3, 7.4, 9.1) are intended to help improve oversight and quality of learner experience in all education settings. Similarly, where the existing SETs has 'pairs' of standards—where a similar expectation was set out in two separate standards, with one specifying that it applied in practice-based settings—these have been combined to create equivalent standards that apply to all settings (6.1, 9.2, 9.3). These changes aim to improve consistency in the quality of education and training for all learners, regardless of their route into the profession.

Age (includes children, young people and older people)

31. Individuals can be at risk of encountering discrimination, harassment, or victimisation due to misconceptions or discriminatory attitudes regarding their age.⁸ Some of the changes to the SETs aim to help to reduce the risks of age-related discrimination or other harm related

⁵ [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](#); [Automated Decision-Making Fairness in an AI-driven World: Public Perceptions, Hopes and Concerns: Key Findings](#).

⁶ [Creating a more supportive and inclusive university culture: a mixed-methods interdisciplinary comparative analysis of medical and social sciences at the University of Oxford](#).

⁷ [Sustainable Degree Apprenticeships](#); [Widening Participation and Degree Apprenticeships](#).

⁸ [Attitudes to ageing amongst health care professionals: a qualitative systematic review](#); [Promoting Age Inclusivity in Higher Education: Campus Practices and Perceptions by Students, Faculty, and Staff](#)

to age for learners, staff, service users, or others involved in programmes. These changes include highlighting fairness, inclusion, safety, and wellbeing throughout the SETs (2.3, 3.1-3.5, 4.1-4.3, 6.4, 6.5, 7.5, 8.6), as well as expectations that EDI principles are embedded in policies and strategies across the institution (2.2, 7.2), with the right structures and resources in place to support this (2.1, 2.4, 5.1, 6.1-6.3, 6.6, 6.7, 7.3, 8.7, 8.8, 8.10, 9.1-9.3). These changes aim to strengthen expectations that education providers challenge discrimination, protect the wellbeing of all those involved in programmes, and deliver fair opportunities for learners to participate and succeed.

32. Most HCPC-approved programmes 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 (see further discussion in the section on Sex).
33. OfS research suggests that 'mature students' (defined as aged over 21 when entering higher education) tend to perform less well than younger learners.⁹ Changes to the SETs about improving outcomes and experiences for learners are intended to help address differential attainment for disadvantaged learners, such as mature students. 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, 9.3). This aligns with the PSA's expectation that regulators develop and implement plans to reduce any identified unfair differential attainment in education and training.
34. Learners' age when beginning training may influence both their choices and the barriers they face around enrolment and participation in different types of programmes—i.e. more traditional courses or earn-and-learn routes like employer-led models of learning and apprenticeships.¹⁰ Literature also found trends in learners' outcomes from apprenticeship programmes linked to their age and socio-economic status.¹¹ Some of the changes to the SETs are intended to help to improve experiences of learners undertaking less traditional learning routes—such as apprenticeships and employer-led programmes—and improve consistency in access to and quality of learning in different settings. These changes include strengthening expectations that there is regular monitoring and evaluation that enhances quality, safety, and fairness across all settings (2.3), sufficient availability of practice-based learning to meet the needs of all learners (7.4), sufficient staff to deliver programmes (9.2), and that education providers maintain their overall responsibility for all settings through formal partnerships with defined responsibilities (2.1, 9.1). These changes aim to improve oversight points across all settings and have a positive impact on learners' experience across delivery models (see more in *General* section.)

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

35. Individuals can be at risk of encountering discrimination, harassment, or victimisation due to misconceptions, unconscious bias, or discriminatory attitudes regarding disability. Some of the changes to the SETs aim to help reduce the risks of disability-related discrimination for learners, staff, or others involved in programmes. These changes include highlighting fairness, inclusion, safety, and wellbeing throughout the SETs (2.3, 3.1-3.3, 4.1-4.3, 6.5, 7.5, 8.6), and strengthened expectations that equality, diversity, and inclusion are embedded in policies and strategies across the institution (2.2, 7.2) with the right structures

⁹ [A statistical overview of higher education in England.](#)

¹⁰ [Sustainable Degree Apprenticeships, Widening Participation and Degree Apprenticeships.](#)

¹¹ [A multi-institutional exploration of the social mobility potential of degree apprenticeships.](#)

and resources in place to support this (2.1, 2.4, 5.1, 6.1-6.3, 6.6, 6.7, 7.3, 7.4, 8.3-8.5, 8.7, 8.8, 8.10, 9.1-9.4). These changes are intended to strengthen expectations that education providers challenge discrimination, protect the wellbeing of all those involved in programmes, and deliver fair opportunities for learners to participate and succeed. These changes can be further supported by updating relevant guidance to emphasise the value of listening to feedback and drawing on a wide range of perspectives and evidence, and the importance of using those insights to identify and challenge discrimination and systemic barriers.

36. Disabled people can experience systemic barriers to accessing and succeeding in higher education and employment.¹² Data 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.¹³ Changes to the SETs about improving outcomes and experiences for learners are intended to help address differential attainment for disadvantaged learners, such as disabled learners. 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, 9.3). This aligns with the PSA's expectation that regulators develop and implement plans to reduce any identified unfair differential attainment in education and training.
37. Insights from stakeholders and the literature indicate potential risks of discrimination against learners who seek reasonable adjustments, due to education providers unfairly basing their decisions about reasonable adjustments during the programme on the likely availability of similar adjustments in post-registration practice settings. This can affect admissions decisions and assessments of the learner's ability to meet the standards of proficiency and join the HCPC Register.¹⁴ To reduce the risk of misinterpreted standards contributing to unfair decisions about reasonable adjustments, the guidance can be updated to clarify education providers' role and obligations regarding reasonable adjustments and equality and diversity laws—and how these interact with the standards of proficiency—for SETs about admissions processes (4.1-4.3, 7.5), ensuring learners who complete the programme can meet the standards of proficiency (8.1, 8.2), and appropriate teaching, learning, and assessment methods (8.3-8.6).
38. Similarly, there were concerns that the current wording of the standard relating to learners' ongoing conduct, character, and health (3.4) may be misinterpreted or applied unfairly, creating risks of discrimination against learners with a disability or long-term health condition. Changes to the standard remove the word 'suitability' and instead clarify that the purpose of the standard is about maintaining service user safety. The updated wording gives providers levers to 'manage and address' any identified concerns or unmet support needs that pose a risk to service user safety, and the guidance can provide further

¹² [Inclusion of disabled Higher Education students: why are we not there yet?](#); [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](#).

¹³ [A statistical overview of higher education in England](#); [Equality of access and outcomes in higher education in England](#).

¹⁴ [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](#); [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](#).

clarification that appropriate responses can include interventions to remove a learner from a particular setting or programme, or providing support to help learners manage or overcome issues where appropriate. Further detail about disability, admissions, and reasonable adjustments can be provided in the guidance.

39. There are wording changes to add more explicit expectations of accessibility, inclusion, and fairness in SETs about admissions processes, learning environments, and assessments (3.1, 4.1, 4.2, 8.6). The SET about programme design (8.10) also includes an explicit reference to adaptation to help clarify that the purpose of the standard is to enable not only adapting to new methods and technologies, but also to support things like hybrid delivery, staff or equipment availability, and reasonable adjustments for disability. These changes have been included to help improve accessibility and reduce barriers to participation for disabled learners, service users, and staff. The guidance for the SETs relating to staff support, complaints and reporting processes, entry criteria, and learners and service users contributing to the programme (3.3, 3.5, 6.3, 6.6, 6.7, 7.5) can also be updated to include references to accessibility.
40. There is one change which removes the word 'accessible' from the existing wording of a standard. Changes to the SET about supporting learners' wellbeing and learning needs (3.2) has been simplified and reworded to focus on the outcomes over processes/methods and to enable more flexibility. The new wording no longer includes the word 'accessible', which may be perceived as decreasing expectations of accessibility. To address this, and ensure accessibility expectations remain intact, the associated guidance should be updated to explicitly clarify that meeting the standards means that support systems or services to support learners' wellbeing and learning needs are accessible, safe, and person centred.
41. We heard from stakeholders that there can be challenges in ensuring that certain standards are met in external environments—such as practice-based settings not upholding provider expectations around reasonable adjustments—and that there is some confusion over who bears the responsibility for this. The wording of SETs relating to monitoring programmes, supporting wellbeing, safe learning environments, accessible resources, sufficient staffing, and embedding EDI (2.2, 2.3, 3.1-3.3, 7.2, 7.3, 9.2) specifies that these expectations apply in all settings across the programme; and the guidance for these SETs and those about practice-based learning and teaching and assessment methods (7.4, 8.3-8.6, 9.3) can further clarify that expectations around adjustments or accommodations for disability and different access requirements apply to all settings, including settings overseen by external delivery partners. Changes to the SETs relating to delivery partners (2.1, 9.1) intend to support this further, by clarifying and strengthening expectations of formal arrangements between education providers and programme delivery partners that ensure the education provider's overall responsibility for all parts of the programme. The guidance for these standards can specifically highlight expectations in relation to reasonable adjustments.
42. Some service users may be vulnerable in practice settings due to disability. To help reduce the risk of harm to service users involved in programmes, we have added more explicit references to safety in SETs about programme monitoring, admissions, gaining consent, and appropriate staffing (2.3, 2.4, 4.3, 6.5, 9.2), and strengthened SETs specifically related to service user safety (3.1, 3.4, 3.5, 6.4).
43. Learners and staff with disabilities or long-term health conditions may be impacted differently by policies around absences, exemptions, or extenuating circumstances.¹⁵ Updating guidance for SETs relating to attendance, assessments, and supporting learner

¹⁵ [View of From Policy to Practice: Trauma-Informed Approaches to Student Attendance; Experiences of higher education for students with chronic illnesses.](#)

and staff needs (3.2, 3.3, 5.3, 8.6, 8.10) may help to reduce the risk of these policies creating systemic barriers or disadvantage.

44. Insights from the literature and the expert panels suggest that some technologies, such as AI tools, can have different impacts for neurodiverse learners, both positive and negative.¹⁶ We have added two new SETs which highlight appropriate and ethical use of different technologies in programmes (5.5) and educators being up to date with relevant technologies and tools (9.4). Guidance for the SET relating to the integration of new technologies in programmes (8.10) can also emphasise the importance of considering the potential impacts for different groups, both positive and negative. These changes are intended to help 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)

45. Individuals can be at risk of encountering discrimination, harassment, or victimisation due to misconceptions or discriminatory attitudes regarding their marriage or civil partnership. Though we have not found any notable impacts of the SETs related to the characteristic of marriage and civil partnerships, some of the changes to highlight fairness and inclusion throughout the SETs (as discussed in other sections) may help to reduce any risks of discrimination related to relationship status for learners, staff, service users, or others involved in programmes.
46. For example, learners or staff may be impacted differently by policies around absences, exemptions, or extenuating circumstances, depending on their relationship status and recognition of a long-term partnership.¹⁷ Updating guidance for SETs relating to attendance, assessments, and supporting learner and staff needs (3.2, 3.3, 5.3, 8.6, 8.10) 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)

47. Individuals can be at risk of encountering discrimination, harassment, or victimisation due to misconceptions or discriminatory attitudes regarding their pregnancy, being a new or expectant parent, or having recently given birth. These primarily relate to the impacts on a pregnant persons' health and mobility (see discussions of accessibility, absences, and reasonable adjustments in the section on *Disability*), caring responsibilities for new parents or partners of pregnant people (see discussion of absences in the section on *Caring responsibilities*), or judgement's about a person's pregnancy or likelihood of becoming pregnant related to their age or sex (see discussions about safety and wellbeing and fair processes in the sections on *Age* and *Sex*).¹⁸ Some of the changes to the SETs related to these other characteristics are expected to help reduce the risks of discrimination related to pregnancy or maternity for learners, staff, or others involved in programmes.
48. Some service users may also be vulnerable in practice settings if they are pregnant or have recently given birth. To help reduce the risk of harm to service users involved in

¹⁶ [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](#).

¹⁷ [View of From Policy to Practice: Trauma-Informed Approaches to Student Attendance](#).

¹⁸ [View of From Policy to Practice: Trauma-Informed Approaches to Student Attendance](#); [Pregnancy Discrimination in Higher Education](#); [Protecting Pregnancy – Cornell Law Review](#); [Maternity provision, contract status, and likelihood of returning to work: Evidence from research intensive universities in the UK](#). Note that this EIA does not intend to replicate or discuss at length any inequalities covered by legislation, such as the Employment Rights Act 1996.

programmes, we have added more explicit references to safety in SETs about programme monitoring, admissions, gaining consent, and appropriate staffing (2.3, 2.4, 4.3, 6.5, 9.2), and strengthened SETs specifically related to service user safety (3.1, 3.4, 3.5, 6.4).

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

49. Discrimination, harassment, and victimisation based on misconceptions or discriminatory attitudes about ethnicity, race, or nationality can have an impact on learners' outcomes and experiences in education and training. Work on differential attainment in UK programmes of education shows that while White learners are less likely than any other ethnic group to attend university, those who do attend higher education tend to perform better and are less likely to drop out than other ethnic groups.¹⁹ This aligns with research which has shown that Black, Asian, minority ethnic and racially minoritised 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.²⁰ These risks can also overlap with those experienced by migrants, international students, and refugees.²¹
50. Some of the changes to the SETs aim to help reduce the risks of racial discrimination for learners, by strengthening expectations that education providers challenge discrimination, protect the wellbeing of all those involved in programmes, and deliver fair opportunities for learners to participate and succeed. These changes include highlighting fairness, inclusion, safety, , and wellbeing throughout the SETs (2.3, 3.1, 3.2, 4.1-4.3, 6.5, 6.7, 7.5, 8.6), and strengthened expectations that principles of equality, diversity, and inclusion are embedded in policies and strategies across the institution (2.2, 7.2) with the right structures and resources in place to support them (2.1, 2.4, 3.3, 5.1, 6.1, 6.2, 6.6, 7.3, 8.7, 8.8, 8.10, 9.1-9.3). These changes can be further supported by updates to the guidance to emphasise the value of listening to feedback and drawing on a wide range of perspectives and evidence. Some of these changes are expected to also help to improve the experiences of staff, and changes to the SETs related to service user safety and consent (3.1, 3.4, 3.5, 6.4) aim to help to reduce the risk of racial discrimination or other harm to service users involved in programmes.
51. Literature highlights a risk that staff from minority groups can carry a disproportionate amount of the work to implement improvements and reduce discrimination in organisations when it is not part of their role, and often do so without appropriate compensation for their time or resource—which can create increased pressure and stress at work.²² Updating the guidance for SETs about monitoring programmes, embedding EDI across all settings, and supporting wellbeing (2.2, 2.3, 3.1, 3.2, 3.3, 7.2) to clarify expectations around appropriate

¹⁹ [Equality of access and outcomes in higher education in England](#); [Undergraduate degree results - Ethnicity facts and figures](#); [A statistical overview of higher education in England](#).

²⁰ [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](#).

²¹ [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 Background Students in England and Poland](#); [International tourism and racism](#); [A Modern Guide to Refugee Education: Comparative Perspectives and Innovative](#).

²² [Addressing disparities in academic medicine: what of the minority tax?](#); [The 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](#).

resourcing and support to identify and implement improvements may help reduce the risk of individual staff being unfairly overburdened.

52. Other changes to the SETs have been included to help to address differential attainment for learners of different ethnic groups. These changes include strengthening expectations that insights gained from monitoring and evaluation processes are used to take actions towards improvements (2.3), that learners receive the necessary feedback to play a more active role in their development (5.6), and that learners' support needs are met (3.1, 3.2, 6.1, 7.3, 9.3). This aligns with the PSA's expectation that regulators develop and implement plans to reduce any identified unfair differential attainment in education and training.
53. Learners and staff from different cultural backgrounds or nationalities may be impacted differently by policies around absences, exemptions, or extenuating circumstances—for example, who is considered a close family member, needing to travel overseas, or different practices around significant events like births, deaths, or marriages.²³ Updating the guidance for SETs relating to attendance, assessments, and supporting learner and staff needs (3.2, 3.3, 5.3, 8.6, 8.10) may help to reduce the risk of these policies creating systemic barriers or disadvantage.
54. 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. Changes to SETs relating to admissions (4.1, 4.2, 7.5) emphasise fairness and strengthen expectations that admissions processes are accessible to applicants who may have non-typical documents or evidence required for admissions assessment. This can be further supported by updated guidance.
55. 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 (4.3). The 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.
56. 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.²⁴ We have added two new SETs about appropriate skills and use of technology in programmes (5.5, 9.4), and expectations that the integration of new technologies in programmes is done thoughtfully (8.10). Guidance for these standards can include further detail about considering the potential impacts of technologies for different groups, both positive and negative. These changes aim to reduce the risks of inadvertent negative impacts from 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.

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

57. 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, and data has

²³ [View of From Policy to Practice: Trauma-Informed Approaches to Student Attendance.](#)

²⁴ [AI Detection's High False Positive Rates and the Psychological and Material Impacts on Students; Health professions school applicant experiences of discrimination during interviews.](#)

shown an increase in religiously motivated hate crimes in England and Wales targeted at Muslims.²⁵ The recent Lord Mann review of antisemitism and other forms of racism in the NHS and healthcare regulatory system has also highlighted the prevalence of antisemitism in healthcare settings.²⁶

58. Some of the changes to the SETs aim to help reduce the risks of discrimination related to religion or belief for learners, staff, service users, or others involved in programmes. These changes include highlighting fairness, inclusion, safety, and wellbeing throughout the SETs (2.3, 3.1-3.5, 4.1-4.3, 6.4, 6.5, 7.5, 8.6), and strengthened expectations that equality, diversity, and inclusion are embedded in policies and strategies across the institution (2.2, 7.2) with the right structures and resources in place to support them (2.1, 2.4, 5.1, 6.1, 6.3, 6.6, 6.7, 7.3, 8.7, 8.8, 8.10, 9.1-9.3). These changes can be further supported by updating relevant guidance to emphasise the value of listening to feedback and drawing on a wide range of perspectives and evidence, and the importance of using those insights to identify and challenge discrimination and systemic barriers.
59. 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.²⁷ Updating the guidance for SETs relating to attendance, assessments, and supporting learner and staff needs (3.2, 3.3, 5.3, 8.6, 8.10) may help to reduce the risk of these policies creating systemic barriers or disadvantage.
60. Some service users may be vulnerable in practice settings due to their religion or belief. To help reduce the risk of harm to service users involved in programmes, we have added more explicit references to safety in SETs about programme monitoring, admissions, gaining consent, and appropriate staffing (2.3, 2.4, 4.3, 6.5, 9.2), and strengthened SETs specifically related to service user safety (3.1, 3.4, 3.5, 6.4).

Sex (includes men and women)

61. Individuals can be at risk of encountering discrimination, harassment, or victimisation due to misconceptions or discriminatory attitudes regarding their sex. 2023 statistics suggest that the majority of staff in UK HEIs are female, with health subjects showing the highest proportion of female academic staff; and the majority of HCPC-registrants are female, with some professions being more significantly female-dominated.²⁸ Therefore, male learners and staff are more likely to be in the minority in education and training settings relating to HCPC-regulated professions—though these figures do not account for seniority and data suggests that men are more likely to be in senior positions.²⁹
62. In most instances, discrimination and systemic barriers related to sex have the greatest negative impact for women, and most research focuses on the experiences of women in male-dominated environments—though research suggests that women still experience sex-based discrimination and systematic barriers in spaces that have a female majority, like

²⁵ [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](#); [Hate crime, England and Wales, year ending March 2025](#).

²⁶ [Lord Mann review of antisemitism and other forms of racism in the NHS and healthcare regulatory system](#).

²⁷ [View of From Policy to Practice: Trauma-Informed Approaches to Student Attendance](#); [Shabbat and Shattered Dreams: Religious Accommodations for Public Exams in South Korea](#); [Religious observance accommodation in Ontario universities](#).

²⁸ [Diversity data | The HCPC](#); [Equality in higher education: statistical reports 2023](#).

²⁹ [Exploring Diversity and Inclusion in the NHS](#); [Advancing gender equality through the Athena SWAN Charter for Women in Science: an exploratory study of women's and men's perceptions](#) | [Health Research Policy and Systems](#).

higher education.³⁰ 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 in spaces where they are the minority.³¹

63. Some of the changes to the SETs aim to help reduce the risks of discrimination related to sex for learners, staff, or others involved in programmes. These changes include highlighting fairness, inclusion, safety, and wellbeing throughout the SETs (2.3, 3.1-3.5, 4.1-4.3, 6.4, 6.5, 7.5, 8.6), and strengthened expectations that equality, diversity, and inclusion are embedded in policies and strategies across the institution (2.2, 7.2) with the right structures and resources in place to support this (2.1, 2.4, 5.1, 6.1, 6.3, 6.6, 6.7, 7.3, 8.7, 8.8, 8.10, 9.1-9.3). These changes are intended to strengthen expectations that education providers challenge discrimination, protect the wellbeing of all those involved in programmes, and deliver fair opportunities for learners to participate and succeed.
64. Data 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.³² Changes to the SETs about improving outcomes and experiences for learners are intended to help address differential attainment, which may have a positive impact for male learners in allied health programmes. 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, 9.3). This aligns with the PSA's expectation that regulators develop and implement plans to reduce any identified unfair differential attainment in education and training.
65. Research 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.³³ 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. Some of the changes to the SETs are intended to help reduce the risks of sexual harassment or assault, including broadening the SET relating to safe and supportive learning environments to include all those involved in a programme (3.1), separating the existing SET about obtaining consent into two distinct SETs about consent from learners (6.5) and service users and carers (6.4), and adding explicit reference to safety in SETs relating to programme monitoring, admissions, and appropriate staffing (2.3, 2.4, 4.3, 9.2). This can be further supported by updating the guidance related to learner complaints.
66. 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. To help reduce the risk of harm to service users involved in programmes, we have added more explicit references to safety in SETs about programme monitoring, admissions,

³⁰ [Gender Discrimination in the Academic Profession](#); [Creating a more supportive and inclusive university culture: a mixed-methods interdisciplinary comparative analysis of medical and social sciences at the University of Oxford](#).

³¹ [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](#); [Frontiers | Are the Processes Underlying Discrimination the Same for Women and Men? A Critical Review of Congruity Models of Gender Discrimination](#).

³² [A statistical overview of higher education in England](#); [What are HE students' progression rates and qualifications?](#).

³³ [Tackling sexual misconduct in universities and colleges](#).

gaining consent, and appropriate staffing (2.3, 2.4, 4.3, 6.5, 9.2), and strengthened SETs specifically related to service user safety (3.1, 3.4, 3.5, 6.4).

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

67. 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. Some of the changes to the SETs have been included to help reduce the risks of discrimination or other harm to learners, staff, service users, or others involved in programmes, including highlighting fairness, inclusion, safety, and wellbeing throughout the SETs (2.3, 3.1-3.5, 4.1-4.3, 6.4, 6.5, 7.5, 8.6), and strengthened expectations that equality, diversity, inclusion, and fairness are embedded in policies and strategies across the institution (2.2, 7.2) with the right structures and resources in place to support them (2.1, 2.4, 5.1, 6.1-6.3, 6.6, 6.7, 7.3, 8.7, 8.8, 8.10, 9.1-9.3). These changes are intended to strengthen expectations that education providers challenge discrimination, protect the wellbeing of all those involved in programmes, and deliver fair opportunities for learners to participate and succeed. These changes can be further supported by updating relevant guidance to emphasise the value of listening to feedback and drawing on a wide range of perspectives and evidence, and the importance of using those insights to identify and challenge discrimination and systemic barriers.
68. 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.³⁴ Updating the guidance for SETs relating to attendance, assessments, and supporting learner and staff needs (3.2, 3.3, 5.3, 8.6, 8.10) 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)

69. Individuals can be at risk of encountering discrimination, harassment, or victimisation due to misconceptions or discriminatory attitudes regarding their sexual orientation.³⁵ Some of the changes to the SETs aim to help reduce the risks of discrimination related to sexual orientation for learners, staff, service users, or others involved in programmes. These changes include highlighting fairness, inclusion, safety, and wellbeing throughout the SETs (2.3, 3.1-3.5, 4.1-4.3, 6.4, 6.5, 7.5, 8.6), and strengthened expectations that equality, diversity, inclusion, and fairness are embedded in policies and strategies across the institution (2.2, 7.2) with the right structures and resources in place to support them (2.1, 2.4, 5.1, 6.1-6.3, 6.6, 6.7, 7.3, 8.7, 8.8, 8.10, 9.1-9.3). These changes are intended to strengthen expectations that education providers challenge discrimination, protect the wellbeing of all those involved in programmes, and deliver fair opportunities for learners to participate and succeed. These changes can be further supported by updating relevant guidance to emphasise the value of listening to feedback and drawing on a wide range of perspectives and evidence, and the importance of using those insights to identify and challenge discrimination and systemic barriers.
70. Literature highlights a risk that staff from minority groups such as LGBTQIA+ can carry a disproportionate amount of the work to implement improvements and reduce discrimination in organisations when it is not part of their role, and often do so without appropriate compensation for their time or resource—which can create increased pressure and stress

³⁴ [View of From Policy to Practice: Trauma-Informed Approaches to Student Attendance.](#)

³⁵ [Challenges of Lesbian, Gay, Bisexual, Transgender, Queer, Intersex, and Asexual \(LGBTQIA\) Students in Higher Education.](#)

at work.³⁶ Updating the guidance for SETs about monitoring programmes, embedding EDI across all settings, and supporting wellbeing (2.2, 2.3, 3.1, 3.2, 3.3, 7.2) to clarify expectations around appropriate resourcing and support to identify and implement improvements may help reduce the risk of individual staff being unfairly overburdened.

Other identified groups

Socio-economic disadvantage and lower income.

71. OfS considers learners from low socio-economic backgrounds and deprived areas to be a disadvantaged group, and research indicates a pattern of learners from areas with higher levels of deprivation having lower than average rates of continuation, completion, attainment, and progression.³⁷ Changes to the SETs about improving outcomes and experiences for learners have been included to help address differential attainment for disadvantaged learners, such as those with fewer financial resources or from low socio-economic backgrounds. These changes include emphasising 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, 9.3). This aligns with the PSA's expectation that regulators develop and implement plans to reduce any identified unfair differential attainment in education and training.
72. 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. Updating the guidance relating to admissions, meeting learner needs, and the accessibility of resources to support learning (3.2, 4.1, 7.3) could help providers to consider financial barriers to access and improve communication about expected costs and financial implications of undertaking a programme. This could have positive impacts for learners from low socio-economic backgrounds where cost and affordability pose a barrier to access, and could help to reduce the risks of learners encountering unexpected financial barriers after commencing a programme.
73. Learners, service users, and carers may also experience barriers to contributing to programmes due to socio-economic pressures. Updating the guidance for SETs relating service users, carers, and learners being involved in programme design and evaluation (6.3) could have a positive impact on the risk of financial barriers to participation in these processes.
74. Stakeholders highlighted possible risks when the number of places on programmes exceeds 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. Although this is beyond the scope of the SETs, changes to standards relating to the financial sustainability of programmes (1.1) and the availability and capacity of practice-based learning (7.4) may help reduce the risks of learners being put at financial risk, and the guidance can be updated to highlight this as a consideration.
75. The expert panels discussed the differences in learning experiences and outcomes from different models of learning, and the interaction between socio-economic status and the choices and barriers around enrolment and participation in different types of programmes—

³⁶ [Tackling the Minority Tax: A Roadmap to Redistributing Engagement in Diversity, Equity, and Inclusion Initiatives; Workplace experiences of LGBTQIA+ trainees, staff, and faculty in academic psychology, psychiatry, and neuroscience departments.](#)

³⁷ [A statistical overview of higher education in England; Equality of access and outcomes in higher education in England.](#)

i.e. more traditional courses or earn-and-learn routes like paid employment-based programmes or apprenticeships.³⁸ Changes about improving oversight and aligning expectations of learner experience in all education settings (2.1, 2.3, 4.1, 4.2, 6.1, 7.1, 7.4, 7.5, 9.1, 9.2, 9.3) are intended to help ensure that learners receive the same quality of learning and support in all settings, regardless of the method of learning they are undertaking (see more discussion in the *General* section).

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

76. Learners and staff with caring responsibilities may be impacted by policies around absences, exemptions, or extenuating circumstances.³⁹ Updating the guidance for SETs relating to attendance, assessments, and supporting learner and staff needs (3.2, 3.3, 5.3, 8.6, 8.10) 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)

77. OfS considers care-experienced learners a disadvantaged group and literature shows connections between experience in care and lower educational outcomes and lower continuation rates.⁴⁰ Changes to the SETs about improving outcomes and experiences for learners are intended to help address differential attainment for disadvantaged learners, such as those with care experience. 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, 9.3). This aligns with the PSA's expectation that regulators develop and implement plans to reduce any identified unfair differential attainment in education and training.

Four countries diversity

78. Differences in local laws and legislation in the four countries create different environments for providers. For example, the equality legislation applicable in Northern Ireland differs from that in the rest of the UK, but the SETs do not create duties or obligations that conflict with this, and the SETs will still support legal compliance in Northern Ireland. Beyond this, it is not expected that the changes will impact any of the four countries differently.
79. During the consultation period, we received submissions from respondents based in all four UK countries, including 118 from England, eight from Scotland, five from Wales, and two from Northern Ireland. 19 respondents, including 11 professional bodies, identified as working UK-wide. All respondents who identified as students were based in England.
80. While the majority of submissions were from those based in England, at least one HEI in each of the four UK countries submitted a response, as well as two which operate UK-wide.

³⁸ [Widening Participation and Degree Apprenticeships](#).

³⁹ [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](#).

⁴⁰ [A statistical overview of higher education in England](#); [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](#).

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?

81. It is not expected that the changes will have a notable impact on 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?

82. The consultation documents were available in Welsh and English, and respondents had the option to submit to the consultation using either a Welsh or English version of the online submission platform.

83. The updated standards will be available in Welsh and English.