

Equality Analysis: Template Form

This form supports you to undertake an equality analysis of the policy or change you are proposing to ensure meaningful consideration of the various impacts it may have on different groups within our diverse community. Please refer to the [Equality Analysis Guidance document](#) to support you to complete this exercise. Depending on the change you are considering, this form can be adapted to best fit the scale of your analysis.

Throughout this guidance the term 'policy' is used to include a wide range of activities, for example processes, procedures, projects and initiatives.

Policy Title	Extenuating Circumstances Policy
Purpose	The extenuating circumstances policy provides a transparent framework enabling consistent assessment of claims and advice and guidance for students.
Equality Analysis Lead(s)	Angela Jones
Policy Sponsor (if applicable)	Chris Shelley
Date of equality analysis	20 February 2025
School/Institute/Department	Student Experience
Is the policy new or existing?	New policy replacing existing regulations
Has the policy previously been subject to equality analysis?	No
If so, what are the main changes since the last analysis?	No previous analysis, however, main changes are:

	<ul style="list-style-type: none"> - Definition of ECS - Disability has been removed from the list of exclusions for ECs - Clarification of the standard of evidence - Adjustment to the number of times each year a student can self-certify from 3 to 2 with an third claim dependent on a meeting with school/institute. - Limitation to the number of times a student can submit a self-certification claim in any single examination period to one. - Introduction of consistent deadlines - Clarification of outcomes - Enable students to appeal on receipt of the outcome and not their results - Oversight by a single panel rather than through Subject Examination Boards (SEB)
Committee/group giving formal approval (if applicable)	EC Policy Review Working Group
1. Consider your approach to undertaking equality analysis. This is an opportunity to consider how you will approach your equality analysis; who are your key stakeholders and who needs to be involved, how will you embed the equality analysis into the wider decision-making process, what scale of impact do you anticipate?	

Key stakeholders are students. Additionally, Student Support Officers assess EC claims. Academic role holders eg Directors of Education, ECSB Chairs and Senior Tutor (or equivalent) will also be impacted.

Prior to review of the policy students and staff, including SSOs were invited to feedback on the current regulations and processes. The purpose of consultation was to determine the impact of the existing practice on students and staff and to identify and address any issues that had been identified.

Qualitative data was reviewed to determine the number of claims and their spread throughout the University to determine if some schools were impacted more than others.

The draft policy incorporated this feedback. It has been circulated to specialist advice services and schools and institutes and the Students' Union for their review.

The policy will apply to all students. It aims to introduce consistency in deadlines, timeframes for assessment and decisions. As the previous regulations were interpreted differently in different schools, this will impact students and staff in some schools more than others as we seek to introduce the policy.

2. Supporting Queen Mary's Values and Strategy 2030

- How does this policy demonstrate Queen Mary's [Values in action](#)?
- What opportunities are there for this policy to progress positive impact across protected characteristics and beyond?
- How does it support the aims of Queen Mary Strategy 2030, including our mission to be the most inclusive university of our kind

How does this policy demonstrate Queen Mary's [Values in action](#)?

Inclusive: It strives for fairness in assessment of EC claims. The Policy is in place to ensure support to students whose studies may be impacted by circumstances outside their control. By providing a transparent framework it will allow the assessment of EC claims in the same way throughout schools and institutes (there is current discrepancy). Changes in oversight will support consistency for students and staff. The policy now allows disabled students (who were previously excluded from the regulations) to claim ECs and to consider the needs of Care Experienced students and Carers.

Proud: Providing appropriate support to students. Empower staff to feel proud of the decisions they are making on EC claims within the framework outlined in the Policy (and supported by supporting guidance and planned oversight group).

Ambitious: A new policy will aim for excellence in the processing of EC claims and the advice given about them. Changes to oversight of the policy and rules will enable opportunities for continuous improvement for support and guidance to students and staff.

Collegial: The changes in oversight will facilitate working collaboratively and the building of partnerships within and across faculties. The oversight group will receive complex cases and queries to provide support to individuals and the community assessing claims. They will work respectively to resolve issues and provide decisions to support colleagues.

Ethical: The oversight group will implement and champion good practice. The group will aim to understand the impact of the policy on others including students and EC assessors. They will build a supportive network to identify where others need help.

What opportunities are there for this policy to progress positive impact across protected characteristics and beyond?

The Policy aims to provide a transparent framework for students who are experiencing difficulties that are impacting their studies. The clarification of arrangements across the institution including the definition of extenuating circumstances, the deadlines for submitting claims and the SLA of when students should expect to hear an outcome have been included to have a positive impact on all students. It is more likely that students who have disabilities or caring responsibilities are likely to have circumstances beyond their control. Specific mention of support is outlined in the policy.

How does it support the aims of Queen Mary Strategy 2030, including our mission to be the most inclusive university of our kind

The need for consistent advice and support for our students is outlined in our Education and Student Experience Enabling Plan which supports the Queen Mary Strategy 2030. We have reviewed our Extenuating Circumstances (EC) Policy to enable us to provide consistent and fair support for students through assessments.

By outlining support for disabled students, carers and care experienced students, this supports the QM Strategy 2030 to be the most inclusive university of our kind.

3. Evidence and information

Consider what sources of information you will need to undertake your equality analysis. You should consider both quantitative and qualitative information and must consider the protected characteristics listed below as a minimum. You should consider what information is already available and whether any additional data is required.

The potential impacts you anticipate the policy may have should inform your approach.

Any student who has circumstances that are impacting their studies are likely to be impacted. Anecdotal feedback advised these circumstances are more likely to impact students with a disability or caring responsibilities.

Consultation with all Schools and Institutes, Specialist Services eg ACS, DDS, Academic Advice Service and the Students' Union.

Levels of uptake of provision.

Additional focus groups and interviews have been arranged with:

- Student Support Officers (all characteristics)
- DDS – Disability
- ACS – Carers, Care Experienced, socio-economic background
- ACCO re complaints

Review the data of acceptance/decline to determine if there are discrepancies.

It has not been possible to find national data on the acceptance of extenuating circumstances claims by protected characteristics. To consider a comparison of this policy we've reviewed adjustments made in the sector. This includes:

- Late submission – commonly 5 – 10 days with some universities choosing not to allow late submission – Proposed 7 - 14 days
- Extensions – commonly 7 – 14 days – This policy is in line
- Self-certification – typically 2-3 times per year. This policy is in line.

4. Engagement and qualitative data

- What engagement exercises have taken place already?
- What do the findings show? How will these inform the proposed policy?
- Is any further engagement required to inform your assessment of potential impacts?

All students were invited to consult as part of the Process and Service Improvement Review.

Academic role holders eg SEB and ECSB Chairs and Senior Tutor or equivalents as well as Student Support Officers were invited to give their feedback on the impact of the existing regulations.

They have informed the Policy:

Disabled students: Exclusion of disability as a justification for an EC – this has been removed and clarification given on disability. The need to produce multiple evidence for a disability has been removed.

Carers: Explicit mention of support for carers, a group that was previously excluded.

Care experienced: Explicit mention of care experienced students and removal of the need for evidence.

Socio-economic background – continued use of self-certification within the policy.

5. Assessment of potential impact on different groups		
<ul style="list-style-type: none"> - The list below follows the legal framework of the Equality Act 2010 and the groups protected within it as well as additional groups whose needs should be considered. You can add any additional groups to this list where relevant. - Consider both negative and positive impacts here - Please consider intersectionality throughout your assessment 		
Characteristic <i>(Characteristics in bold reference those which are protected under the Equality Act 2010)</i>	Impact identified <ul style="list-style-type: none"> - Negative - Positive - Neutral/non identified 	Rationale <ul style="list-style-type: none"> - What data or information has informed your assessment of impact
		All students were invited to feedback on the current process as part of the Process and Service Improvement Review.

		Changes in the policy seek to establish a framework for the submission, assessment and oversight of the EC process to establish consistency.
Age	Neutral/non identified	<p>The changes in the policy are not specific to this characteristic.</p> <p>Review of data from current process shows us: There is a 4% discrepancy between the group with the lowest and highest acceptances. This is not considered significant.</p>
Disability	Neutral/non identified	<p>The changes in the policy are not specific to this characteristic.</p> <p>Review of data from current process shows us: Claims for students who have declared a disability have been accepted 87% cf to 84% for those who haven't declared. This is not considered significant.</p>
Marriage and Civil Partnerships	Neutral/non identified	<p>The changes in the policy are not specific to this characteristic.</p> <p>This data is not available in the student records system.</p>
Race & Ethnicity <i>(including nationality and citizenship)</i>	Neutral/non identified	<p>The changes in the policy are not specific to this characteristic.</p> <p>Review of data from current process shows us: Claims submitted by white students are accepted 3 – 6% more often than other ethnicity groups.</p>
Religion or belief	Neutral/non identified	<p>The changes in the policy are not specific to this characteristic.</p> <p>Review of data from current process shows us:</p>

		The data shows a 19% difference in acceptance rate between Sikh and any other religious belief and Jewish students. Assessors are unlikely to know the religious belief when assessing claims.
Pregnancy and maternity	Neutral/non identified	The changes in the policy are not specific to this characteristic. This data is not available in the Student Records System.
Sex <i>(The Equality Act 2010 defines 'sex' as relating to male and female)</i>	Neutral/non identified	The changes in the policy are not specific to this characteristic. Review of data from current process shows us: Claims from female students have been accepted 5% more than male students.
Sexual Orientation / LGBTQIA+	Neutral/non identified	The changes in the policy are not specific to this characteristic. Review of data from current process shows us The difference in acceptance between heterosexual and LGBQA+ groupings is 3%.
Trans and non-binary people <i>(The Equality Act 2010 uses the term 'Gender Reassignment')</i>	Neutral/non identified	The changes in the policy are not specific to this characteristic. Review of data from current process shows us: The difference between acceptances for non-binary students is 6% higher than male students.
Caring responsibilities	Positive	There is no data recorded in the student records database. Specialist Advisors in the Advice and Counselling Service has led to recognition of this group in the policy.

Socio-economic background or status	Neutral/non identified	<p>The changes in the policy are not specific to this characteristic.</p> <p>Review of data from current process shows us: There is no significant difference in acceptances.</p> <p>The need to pay for evidence was considered as part of the discussions on the continuation of self-certification.</p>
Menopause	Neutral/non identified	<p>The changes in the policy are not specific to this characteristic.</p> <p>This data is not recorded in the Student Records database.</p>
<i>Additional: Care Experienced</i>	Positive	<p>Feedback from specialist advisors in ACS has led to a change in the policy to recognise the impact of being care experienced on study.</p> <p>92% of claims submitted by care leavers are accepted compared to 86% of non-care leavers.</p>
<i>Additional: By School</i>	Negative	<p>Some schools receive a higher or lower portion of claims than their student numbers would expect. Initial review of this suggests this is because of:</p> <ul style="list-style-type: none"> - Numbers of assessment - Lab based courses <p>The number of assessments are outside the scope of this policy, however, this can be reported on and reviewed, making recommendations as appropriate.</p>

6. Action plan to eliminate or reduce adverse impact.

- The template below allows you to identify specific actions to address any negative impact that you have identified through your assessment.
- Negative impact should be address before the policy is put into place.
- This may include actions already undertaken since the beginning of this equality analysis exercise.

Impact identified	Action planned	Timeframe
N/A	Share EIA with the EC oversight panel	By June 2025
<p>Disparity in claims accepted by different characteristics:</p> <ul style="list-style-type: none"> • White students are more likely to have their claims accepted. • Female and non-binary students are more likely to have their claims accepted. • Claims from students who are Sikh or 'any other' religious belief are less likely to be accepted. 	<p>Clarity in the policy on the level of detail and status of evidence required to be submitted.</p> <p>Updated guidance for students on claim submission.</p> <p>Introduce guidance for staff assessing claims to provide consistency on decision making.</p> <p>Introduction of an Oversight Panel to oversee and support decision making.</p> <p>Annual reports to review data</p>	<p>June 2025</p> <p>August 2025</p> <p>September 2025</p> <p>September 2025</p> <p>September 2026</p>
Higher numbers of claims in some schools	Review of numbers of assessments within each module and the introduction of programme level assessment.	Ongoing and by September 2026

7. Decision

Is the policy ready for implementation:	YES	NO
Equality analysis reviewed by (e.g., relevant governance group):	The EC Policy Review Working Group	

If "No", what action will be taken?	
8. Monitoring and Review <ul style="list-style-type: none"> - How will you monitor the impact of your project once it has been implemented? - Include date for review and person(s)/group/committee responsible 	
<p>The EC oversight panel will</p> <ul style="list-style-type: none"> - February 2026 - undertake quantitative review of students submitting EC claims (after the outcomes of the first exam period) and, if necessary, make appropriate recommendations. - February 2026 - consult with SSOs - February 2026 – consult with Students’ Union - July 2026 – undertake quantitative review of students submitting claims 	
Date for review	July 2026
Person responsible	Chris Shelley
Relevant committee(s)/working group(s)	EC oversight panel

Please share your completed equality analysis with the EDI Team by sending this form to hr-equality@qmul.ac.uk

Appendix 1: Space to record the data that has been used in this equality analysis exercise.

We analysed the number of acceptances of extenuating circumstances claims to try to assess impact of protected characteristics.

Age

<p><i>Data redacted</i></p>

Disability

Data redacted

Ethnicity

Data redacted

Sex and Trans/non-binary

Data redacted

Religious Belief

Data redacted

Sexual Orientation

Data redacted

Care Experienced

Data redacted

Income Bracket

Data redacted