

EQUALITY IMPACT ASSESSMENT RECORD

Title of policy/ practice/ strategy/ legislation etc.	Change to the residency criteria for eligibility to student support in Scotland	
Minister	Minister for Higher Education, Further Education, Youth Employment and Training – Jamie Hepburn	
Lead official	Eilidh Stevenson	
Officials involved in the EQIA	name	team
	Eilidh Stevenson	HE Student Financial Support
	Caroline Mackintosh	SGLD
Directorate: Division: Team	Higher Education and Science: Student Support & Participation Team	
Is this new policy or revision to an existing policy?	Revision to an existing policy	

Screening

Policy Aim

To review the current residency criteria and eligibility for student support for Ukrainians and their family members, who have applied to be settled in Scotland under the Ukraine Family Scheme and the Home for Ukraine scheme, and for Ukrainian's living in the UK eligible for the Ukraine Extension Scheme.

In addition, this EQIA will review the current residency criteria and eligibility for student support for Ukrainian nationals who have been granted leave to remain in the UK outside of the Immigration rules, as defined by section 33(1) of the Immigration Act 1971. In order to be eligible these individuals must have been residing in Ukraine immediately before 1 January 2022 and left Ukraine in connection with the Russian invasion which took place on 24 February 2022.

The policy change will amend the current regulations to enable such students to access tuition fee and living cost support. This contributes to the following national outcomes:

This contributes to the following national outcomes:

- We respect, protect and fulfil human rights and live free from discrimination
- We are well educated, skilled and able to contribute to society

The Ukraine Family Scheme

On Friday 4th March 2022, the UK launched the Ukraine Family Scheme. This scheme allows immediate and extended family members of British nationals, people settled in the UK, and certain other residents here, to come to the country.

Those granted under the scheme will be granted a visa that lasts three years, giving them certainty and ensuring their future in the country.

Those applying to the Ukraine Family Scheme:

- must be applying to join or accompany a UK-based family member.
- must be Ukrainian or the immediate family member of a Ukrainian national who is applying to the scheme.
- must have been residing in Ukraine on or immediately before 1 January 2022 (including those who have now left Ukraine).

Homes for Ukraine scheme

The Homes for Ukraine scheme was launched on 14th March 2022 and will allow people seeking sanctuary with no family ties to the UK to be sponsored by individuals or organisations who can offer them a home, such as a spare room or unoccupied residential self-contained unit.

There is no limit on this scheme, it is open to Ukrainian nationals and immediate family members of Ukrainian nationals, and we will welcome as many Ukrainians as wish to come and that have matched sponsors.

Individuals arriving under this scheme will be able to live and work in the UK for up to three years and access healthcare, benefits, employment support, education and other support.

Ukraine Extension Scheme

The Ukraine Extension Scheme will open from Tuesday 3rd May 2022 and is designed to support Ukrainian citizens who were in the UK before the war; on student, skilled worker or seasonal worker visas for example. The scheme allows such individuals to access similar benefits to the other two schemes: three years' permission to stay, with the right to work and benefits.

The scheme requires the applicant to have had permission to enter or stay in the UK on 18 March 2022, unless:

- a) they were in the UK with permission to enter or stay immediately before 1 January but that permission has since expired or
- b) they are a child born in the UK after 18 March 2022.

Dnipro Children and staff

A group of Dnipro children and staff moved to reside at Edinburgh College on 14 April. The group comprises of 59 Ukrainians in total, 50 children and 9 staff with 13 of the children being aged 16 years or older. This group have all been granted leave outside of the rules to remain for a period of three years by the Home Office and have access to public funds. They have not been allocated an immigration status via any of the Home Office schemes set up to afford a form of settlement for Ukrainian nationals.

Who will it affect?

This policy change will affect Ukrainians and their family members who have applied to be settled in Scotland under the Homes for Ukraine Scheme and The Ukraine Family Scheme. In addition, the policy change will affect Ukrainians in the UK, eligible for the Ukraine Extension Scheme, however, this does not extend to their family members, who would have to be eligible to apply on their own right.

Data on the numbers for this student cohort will continue to change as applications for both schemes continue to be made by

Ukrainians, however, as of 24th April 2022, there has been 117,600 visa applications received by the UK Government (42,900 family scheme and 74,700 sponsorship scheme). 86,100 UK visas have been issued (34,900 family scheme and 51,300 sponsorship scheme).

There have been 5,200 visas with a Scottish sponsor (3000 sponsored by the Scottish Government and 2,200 sponsored by private individuals).

University students - In 2020-21, there were around 80 Ukrainian domiciled students. If we consider nationality rather than domicile, we have around 125 Ukrainians.

College students - In 2020-21, there were around 0 Ukrainian domiciled students at Scottish Colleges (rounded to zero). If we consider nationality rather than domicile, we have around 45 Ukrainians.

What might prevent the desired outcomes being achieved?

In amending the residency criteria to allow this group of people to access tuition fee and living-cost support, we must be mindful of the potential financial implications to the student support budget.

As there is no limit on the numbers who can apply under the Homes for Ukraine, Ukraine Family scheme and Ukraine Extension Scheme – the payment of an award to this category of students may slightly increase the pressure on existing student support budgets for Further and Higher education.

The Ukraine Extension scheme specifically could come at a cost to universities, if Ukrainian's on student visas were previously paying international fees, and are now entitled to home fee status via the extension scheme. This will only apply to new students and continuing students who change course.

Stage 1: Framing

Results of framing exercise

An initial framing exercise was undertaken by Higher Education and Science Division to gather evidence to inform this EQIA.

Home Office – The number of Ukrainians living in the UK, number of visa applications and number of granted visa applications.

HESA – The number of Ukrainian domiciled students at Scottish Institutions by age, gender and disability.

Extent/Level of EQIA required

This policy has relevance to the protected characteristic of race and gender.

As the change to the residency policy will open up opportunities to Ukrainians and their family members who have settled in Scotland under the Homes for Ukraine and Ukraine family scheme and to Ukrainians living in the UK under the Ukrainian Extension Scheme, it is considered that a concise and focused Equality Impact Assessment is proportionate in these circumstances.

Stage 2: Data and evidence gathering, involvement and consultation

Include here the results of your evidence gathering (including framing exercise), including qualitative and quantitative data and the source of that information, whether national statistics, surveys or consultations with relevant equality groups.

Characteristic ¹	Evidence gathered and Strength/quality of evidence	Source	Data gaps identified and action taken												
AGE	<p>There is no data to confirm the age breakdown of people entering under the Ukraine Family and Homes for Ukraine scheme.</p> <p>The following statistics show a breakdown of the number of Ukrainian Enrolments at Scottish HEIs in the AY 2020-21 who may be eligible for the Ukraine Extension Scheme, by age:</p> <table border="1" data-bbox="932 972 1110 1720"> <thead> <tr> <th></th> <th>Nationality</th> <th>Domicile</th> </tr> </thead> <tbody> <tr> <td>20 and under</td> <td>40</td> <td>30</td> </tr> <tr> <td>21 to 24</td> <td>45</td> <td>30</td> </tr> <tr> <td>25 and over</td> <td>40</td> <td>20</td> </tr> </tbody> </table> <p>To note: domicile is based on the country the student was living in prior to study and nationality is their legal status. Hence, numbers of domicile and nationality should not be combined as the same students may appear in both figures.</p>		Nationality	Domicile	20 and under	40	30	21 to 24	45	30	25 and over	40	20	HESA – the numbers include full-time, part-time and postgraduate research.	As SAAS/SFC gather statistical data on student applications we will be able to monitor the impact of the policy change on relevant groups going forward.
	Nationality	Domicile													
20 and under	40	30													
21 to 24	45	30													
25 and over	40	20													

¹ Refer to Definitions of Protected Characteristics document for information on the characteristics

The following statistics show a breakdown of the number of Ukrainian Nationals at Scottish Colleges in AY 2021-21 who may be eligible for the Ukraine Extension Scheme, by age:

24 and under	10
25 and under	40

Currently we are aware of 59 adults and children in Scotland who have been granted leave outside the Immigration rules who were resident in Ukraine prior to 1 January 2022 and left Ukraine following the Russian invasion:

	Number
19 and under	50
20 and over	9

There is no data to confirm disability within the people entering under the Ukraine Family and Homes for Ukraine Scheme.

The following statistics show a breakdown of the number of Ukrainian Enrolments at Scottish HEIs in AY 2021-21 who may be eligible for the Ukraine Extension Scheme, by disability:

	Nationality	Domicile

DISABILITY

HESA – the numbers include full-time, part-time and postgraduate research.

As SAAS/SFC gather statistical data on student applications we will be able to monitor the impact of the policy change on relevant groups going forward.

No known disability	120	80
Known disability	5	0

To note: domicile is based on the country the student was living in prior to study and nationality is their legal status. Hence, numbers of domicile and nationality should not be combined as the same students may appear in both figures.

The following statistics show a breakdown of the number of Ukraine Nationals at Scottish Colleges in AY 2021-21 who may be eligible for the Ukrainian Extension Scheme, by disability:

No known disability	45
Disability	5

SEX

There is no data to confirm the gender of people entering under the Ukraine Family and Homes for Ukraine Scheme.

The following statistics show a breakdown of the number of Ukrainian Enrolments at Scottish HEIs in AY 2020-21 who may be eligible for the Ukraine Extension Scheme, by gender:

HESA – the numbers include full-time, part-time and postgraduate research.

As SAAS/SFC gather statistical data on student applications we will be able to monitor the impact of the policy change on relevant groups going forward.

<p>PREGNANCY AND MATERNITY</p>	<table border="1" data-bbox="153 967 288 1720"> <thead> <tr> <th></th> <th>Nationality</th> <th>Domicile</th> </tr> </thead> <tbody> <tr> <td>Male</td> <td>45</td> <td>30</td> </tr> <tr> <td>Female</td> <td>80</td> <td>50</td> </tr> </tbody> </table> <p data-bbox="331 967 454 1720">To note: domicile is based on the country the student was living in prior to study and nationality is their legal status. Hence, numbers of domicile and nationality should not be combined as the same students may appear in both figures.</p> <p data-bbox="497 967 715 1720">The following statistics show a breakdown of the number of Ukrainian Nationals at Scottish Colleges in AY 2021-21 who may be eligible for the Ukraine Extension Scheme, by gender.</p> <table border="1" data-bbox="799 967 890 1720"> <tbody> <tr> <td>Male</td> <td>15</td> </tr> <tr> <td>Female</td> <td>35</td> </tr> </tbody> </table>		Nationality	Domicile	Male	45	30	Female	80	50	Male	15	Female	35		
	Nationality	Domicile														
Male	45	30														
Female	80	50														
Male	15															
Female	35															
	<p data-bbox="1023 1012 1190 1720">There is no data to confirm pregnancy and maternity within the people entering under the Ukraine Family and Homes for Ukraine and Ukraine Extension Scheme.</p>		<p data-bbox="979 129 1361 600">This information is not readily available. SAAS do not gather statistical data on this protected characteristic via student applications, due to this information not being pertinent to the processing of HE funding applications and therefore</p>													

			<p>not being compliant with GDPR regulations.</p> <p>In addition, information on this protected characteristic is not available on the Scottish Government Equality Index Finder and is therefore not collected by HESA or FES.</p>
<p>GENDER REASSIGNMENT</p>	<p>There is no data to confirm gender reassignment within the people entering under the Ukraine Family and Homes for Ukraine and Ukraine Extension Scheme.</p>		<p>This information is not readily available. SAAS do not gather statistical data on this protected characteristic via student applications, due to this information not being pertinent to the processing of HE funding applications and therefore not being compliant with GDPR regulations.</p> <p>In addition, information on this protected characteristic is not available on the Scottish Government Equality Index Finder and is therefore not collected by HESA or FES.</p>

<p>SEXUAL ORIENTATION</p>	<p>There is no data to confirm sexual orientation within the people entering under the Ukraine Family and Homes for Ukraine and Ukraine Extension Scheme.</p>		<p>This information is not readily available. SAAS do not gather statistical data on this protected characteristic via student applications, due to this information not being pertinent to the processing of HE funding applications and therefore not being compliant with GDPR regulations.</p> <p>In addition, information on this protected characteristic is not available on the Scottish Government Equality Index Finder and is therefore not collected by HESA or FES.</p>
<p>RACE</p>			<p>This information is not readily available. SAAS do not gather statistical data on this protected characteristic via student applications, due to this information not being pertinent to the processing of HE funding applications and therefore</p>

			<p>not being compliant with GDPR regulations.</p> <p>In addition, information on this protected characteristic is not available on the Scottish Government Equality Index Finder and is therefore not collected by HESA or FES.</p>
<p>RELIGION OR BELIEF</p>	<p>There is no data to confirm religion or belief within the people entering under the Ukraine Family and Homes for Ukraine and Ukraine Extension Scheme.</p>		<p>This information is not readily available. SAAS do not gather statistical data on this protected characteristic via student applications, due to this information not being pertinent to the processing of HE funding applications and therefore not being compliant with GDPR regulations.</p> <p>In addition, information on this protected characteristic is not available on the Scottish Government Equality Index Finder and is therefore not collected by HESA or FES.</p>

<p>MARRIAGE AND CIVIL PARTNERSHIP (the Scottish Government does not require assessment against this protected characteristic unless the policy or practice relates to work, for example HR policies and practices - refer to Definitions of Protected Characteristics document for details)</p>	N/A		
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Stage 3: Assessing the impacts and identifying opportunities to promote equality

Having considered the data and evidence you have gathered, this section requires you to consider the potential impacts – negative and positive – that your policy might have on each of the protected characteristics. It is important to remember the duty is also a positive one – that we must explore whether the policy offers the opportunity to promote equality and/or foster good relations.

Do you think that the policy impacts on people because of their age?

Age	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation	X			Data to confirm the impact on age as a result of this policy change is limited. However the change will apply to all Ukrainians entering under the Ukraine Family, Home for Ukraine and Ukraine Extension schemes, irrespective of age and this is there seen as a positive change for all. The change will also apply to Ukrainian nationals who have been granted leave to remain in the UK outside of the Immigration rules, irrespective of age and this is therefore also seen as a positive change.
Advancing equality of opportunity	X			This policy change will open up student support to eligible Ukrainians and their family members (depending on scheme), allowing the opportunity for them to access further and higher education in Scotland.
Promoting good relations among and				No evidence of differential impact at this time.

between different age groups		X	
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Do you think that the policy impacts disabled people?

Disability	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation	X			<p>Data to confirm the impact on disability as a result of this policy change is limited. However the change will apply to all Ukrainians entering under the Ukraine Family, Home for Ukraine and Ukraine Extension Scheme, irrespective of disability and this is therefore seen as a positive change for all.</p> <p>The change will also apply to Ukrainian nationals who have been granted leave to remain in the UK outside of the Immigration rules, irrespective of disability and this is therefore also seen as a positive change.</p> <p>Students with a disability would be eligible for additional support through their college or through SAAS, should their disability impact on their studies.</p>
Advancing equality of opportunity	X			<p>This policy change will open up student support to eligible Ukrainians and their family members (depending on scheme), allowing the opportunity</p>

					for them to access further and higher education in Scotland.
Promoting good relations among and between disabled and non-disabled people				X	No evidence of differential impact at this time.

Do you think that the policy impacts on men and women in different ways?

Sex	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination	X			<p>Data to confirm the impact on gender as a result of this policy change is limited. This policy change may be more likely to affect women, given that males over 18 are encouraged to remain in Ukraine in order to participate in the conflict. However the change will apply to all Ukrainians entering under the Ukraine Family and Home, Ukraine and Ukraine Extension Scheme, irrespective of gender and this is therefore seen as a positive change for all.</p> <p>The change will also apply to Ukrainian nationals who have been granted leave to remain in the UK outside of the Immigration rules, irrespective of gender and this is therefore also seen as a positive change.</p>

Advancing equality of opportunity	X			This policy change will open up student support to eligible Ukrainians and their family members (depending on scheme), allowing the opportunity for them to access further and higher education in Scotland.
Promoting good relations between men and women			X	No evidence of differential impact at this time.

Do you think that the policy impacts on women because of pregnancy and maternity?

Pregnancy and Maternity	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination	X			There is no information to confirm the impact on pregnancy and maternity as a result of this policy change. However the change will apply to all Ukrainians entering under the Ukraine Family, Home for Ukraine and Ukraine Extension Scheme, irrespective of pregnancy and maternity and this is there seen as a positive change for all. The change will also apply to Ukrainian nationals who have been granted leave to remain in the UK outside of the Immigration rules, irrespective of pregnancy and maternity and this is therefore also seen as a positive change.
Advancing equality of opportunity	X			This policy change will open up student support to eligible Ukrainians and their family members (depending on scheme), allowing the opportunity

					for them to access further and higher education in Scotland.
Promoting good relations				X	No evidence of differential impact at this time.

Do you think your policy impacts on people proposing to undergo, undergoing, or who have undergone a process for the purpose of reassigning their sex? (NB: the Equality Act 2010 uses the term ‘transsexual people’ but ‘trans people’ is more commonly used)

Gender reassignment	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination	X			There is no information to confirm the impact on gender reassignment as a result of this policy change. However the change will apply to all Ukrainians entering under the Ukraine Family, Home for Ukraine and Ukraine Extension Scheme, irrespective of gender reassignment and this is there seen as a positive change for all. The change will also apply to Ukrainian nationals who have been granted leave to remain in the UK outside of the Immigration rules, irrespective of gender reassignment and this is therefore also seen as a positive change.
Advancing equality of opportunity	X			This policy change will open up student support to eligible Ukrainians and their family members (depending on scheme), allowing the opportunity for them to access further and higher education in Scotland.

Promoting good relations			X	No evidence of differential impact at this time.
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Do you think that the policy impacts on people because of their sexual orientation?

Sexual orientation	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination	X			There is no information to confirm the impact on sexual orientation as a result of this policy change. However the change will apply to all Ukrainians entering under the Ukraine Family, Home for Ukraine and Ukraine Extension Schemes, irrespective of sexual orientation and this is there seen as a positive change for all. The change will also apply to Ukrainian nationals who have been granted leave to remain in the UK outside of the Immigration rules, irrespective of sexual orientation and this is therefore also seen as a positive change.
Advancing equality of opportunity	X			This policy change will open up student support to eligible Ukrainians and their family members (depending on scheme), allowing the opportunity for them to access further and higher education in Scotland.
Promoting good relations			X	No evidence of differential impact at this time.

Do you think the policy impacts on people on the grounds of their race?

Race	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination	X	X		<p>The policy change will affect Ukrainians who have entered Scotland under the Ukrainian Family, Home for Ukrainian, Ukraine Extension schemes and Ukrainian nationals who have been granted leave to remain in the UK outside of the Immigration rules.</p> <p>This policy change will therefore potentially indirectly discriminate in favour of Ukrainian nationals since other international students will be in a less favourable position than those Ukrainian nationals who are able to apply to the scheme prior to starting their course of education (because while the latter will be entitled to home fee status and full student support, other nationalities will be charged the international fee rate).</p> <p>In many cases, Ukrainians may have been at risk of physical harm. For those who were already located in the UK and eligible for the Ukraine Extension Scheme or have been granted leave to remain outside of the Immigration rules – they may not have had a stable home to return to as a result of the conflict in Ukraine.</p>
Advancing equality of opportunity	X			<p>This policy change will open up student support to eligible Ukrainians and their family members (depending on scheme), allowing the opportunity</p>

					for them to access further and higher education in Scotland.
Promoting good race relations			X		No evidence of differential impact at this time.

Do you think the policy impacts on people because of their religion or belief?

Religion or belief	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination	X			There is no information to confirm the impact on religion or belief as a result of this policy change. However the change will apply to all Ukrainians entering under the Ukraine Family, Home for Ukraine and Ukraine Extension schemes, irrespective of religion or belief and this is there seen as a positive change for all.
Advancing equality of opportunity	X			The change will also apply to Ukrainian nationals who have been granted leave to remain in the UK outside of the Immigration rules, irrespective of religion or belief and this is therefore also seen as a positive change. This policy change will open up student support to eligible Ukrainians and their family members (depending on scheme), allowing the opportunity for them to access further and higher education in Scotland.
Promoting good relations			X	No evidence of differential impact at this time.

Do you think the policy impacts on people because of their marriage or civil partnership?

Marriage and Civil Partnership²	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination	N/A			

² In respect of this protected characteristic, a body subject to the Public Sector Equality Duty (which includes Scottish Government) only needs to comply with the first need of the duty (to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010) and only in relation to work. This is because the parts of the Act covering services and public functions, premises, education etc. do not apply to that protected characteristic. Equality impact assessment within the Scottish Government does not require assessment against the protected characteristic of Marriage and Civil Partnership unless the policy or practice relates to work, for example HR policies and practices.

Stage 4: Decision making and monitoring

Identifying and establishing any required mitigating action

If, following the impact analysis, you think you have identified any unlawful discrimination – direct or indirect - you must consider and set out what action will be undertaken to mitigate the negative impact. You will need to consult your legal team in SGLD at this point if you have not already done so.

Have positive or negative impacts been identified for any of the equality groups?	Positive impacts as a result of extending the residency criteria to include Ukrainians entering Scotland through the Ukrainian Family, Home for Ukraine and Ukraine Extension schemes have been identified for students in all equality groups, with the exception of race, where both positive and negative impacts were identified.
Is the policy directly or indirectly discriminatory under the Equality Act 2010 ³ ?	This policy change indirectly discriminates in favour of Ukrainian nationals since other international students will be in a less favourable position than those Ukrainian nationals who are able to apply to the scheme prior to starting their course of education (because while the latter will be entitled to home fee status and full student support, other nationalities will be charged the international fee rates).
If the policy is indirectly discriminatory, how is it justified under the relevant legislation?	This is justified on the basis that other nationalities are not in an “analogous position” to Ukrainian nationals who are at risk of physical harm if they return to their home country. In addition, asylum status can be sought by individuals of other nationalities are also at risk of harm if returning to their home country

³ See EQIA – Setting the Scene for further information on the legislation.

If not justified, what mitigating action will be undertaken?	N/A
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Describing how Equality Impact analysis has shaped the policy making process

The EQIA identified that there are gaps in the information available relating to the characteristics of Ukrainians entering Scotland via the Ukrainian Family, Home for Ukraine, Ukraine Extension schemes and Ukraine nationals who have been granted leave to remain in the UK outside of the immigration rules and therefore the impact that extending the residency criteria for student support in Scotland will have on the protected characteristics.

The UK Government publish immigration statistics but not in the level of detail required for the EQIA. Applications also opened in March 2022 and therefore any data would not be reflective of any future statistics of this student cohort. The Ukraine Extension scheme did not open until May 2022.

Monitoring and Review

We will continue to monitor the number of people who take up residence in Scotland under these schemes and those who have applied for support in Scotland.

As SAAS/SFC gather statistical data on student applications, we will be able to monitor the impact of this policy change on relevant groups going forward.

Stage 5 - Authorisation of EQIA

Please confirm that:

- ◆ This Equality Impact Assessment has informed the development of this policy:

Yes No

- ◆ Opportunities to promote equality in respect of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation have been considered, i.e.:
 - Eliminating unlawful discrimination, harassment, victimisation;
 - Removing or minimising any barriers and/or disadvantages;
 - Taking steps which assist with promoting equality and meeting people's different needs;
 - Encouraging participation (e.g. in public life)
 - Fostering good relations, tackling prejudice and promoting understanding.

Yes No

- ◆ If the Marriage and Civil Partnership protected characteristic applies to this policy, the Equality Impact Assessment has also assessed against the duty to eliminate unlawful discrimination, harassment and victimisation in respect of this protected characteristic:

Yes No Not applicable

Declaration

I am satisfied with the equality impact assessment that has been undertaken for the residency changes to extend to Ukrainian nationals and give my authorisation for the results of this assessment to be published on the Scottish Government's website.

Name: Roddy Macdonald

Position: [Deputy Director]

Authorisation date: 09/05/2022