



Equality Impact Assessment Template

Before carrying out EqIA, you should familiarise yourself with the University's EqIA Policy Statement and Guidance and Checklist Notes, and undertake our online training on Equality and Diversity and EqIA. These, along with further information and resources, are available at www.ed.ac.uk/schools-departments/equality-diversity/impact-assessment

EqIA covers policies, provisions, criteria, functions, practices and activities, including decisions and the delivery of services, but will be referred to as 'policy/practice' hereinafter.

A. Policy/Practice (name or brief description):

Extensions and Special Circumstances (ESC)

The project will be creating a new dedicated team, updating University of Edinburgh (UoE) policy on both Extensions and Special Circumstances, and developing new software to support that team, schools and new processes. This EqIA covers both of these aspects.

B. Reason for Equality Impact Assessment (Mark **yes against the applicable reason):**

- Proposed new policy/practice - **Yes**
 - Practice changing for new dedicated team, and for existing support in Schools/Deaneries
- Proposed change to an existing policy/practice - **Yes**
 - Existing practice in University Schools will change, and existing policies will be updated
- Undertaking a review of an existing policy/practice - **No**
- Other (please state) - **N/A**

C. Person responsible for the policy area or practice:

Name: **Sue MacGregor**

Job title: **Director of Academic Services**

School/service/unit: **Extensions and Special Circumstances team**

D. An Impact Assessment should be carried out if any of the following apply to the policy/practice, if it:

- Affects primary or high level functions of the University - **Yes**
- Is relevant to the promotion of equality (in terms of the Public Sector Equality Duty 'needs' as set out in the Policy and Guidance)? - **Yes**
- It is one which interested parties could reasonably expect the University to have carried out an EqIA? - **Yes**

E. Equality Groups

To which equality groups is the policy/practice relevant and why? (add notes against the following applicable equality group/s)

- Age
- Disability
- Race (including ethnicity and nationality)
- Religion or belief
- Sex

- Sexual orientation
- Gender reassignment
- Pregnancy and maternity
- Marriage or civil partnership¹

As the change has the potential to impact on all students there is the potential for the change to impact positively or negatively on all of the 9 protected characteristics. In addition, this change will impact on staff that form the new team and the staff in Schools who will be following different procedures to that which they have used before.

Disability – With the creation of the new staff team, the accessibility of working locations will be considered. Where a member of staff is unable to work from a location and we are unable to rectify this issue an alternative working location will be sourced. Existing staff moving into this team will have their reasonable adjustments transferred to their new post and discussion will be had to see if any changes or additions to existing reasonable adjustments are needed as a result of the new post. All new staff will be asked about their requirements for any reasonable adjustments and these will be put in place as soon as possible and ideally for their first working day. Both sides of the software will need to be accessible in line with the Web Content Accessibility Guidelines Version 2.1 AA standard including compatibility with assistive software. To ensure this the Information Services Disability Information Officer will test the software and in accordance with The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 and accessibility statement will be added. If for any reason a member of staff or a student was unable to access the software and we were unable to remedy this, reasonable adjustments would be put in place – such as the student contacting the service by email or phone to register special circumstances. There is the intention that this service will also be used by disabled students registered with the Student Disability Service to request for which assessments they require their specific adjustments for. Detailed liaison with the Student Disability Service is taking place to ensure this creates no burden or disadvantage to disabled students in terms of time or unnecessary bureaucracy but actually improves and adds to the current implementation of adjustments.

Race – The system will be in English but as English is the main teaching language of the University and this system will only be accessed by staff and students we do not believe this should create any disadvantage. There may be an issue for some students accessing the systems for other countries with website restrictions such as China and in this case students would be able to email and explain circumstances in this way.

Gender reassignment – the system does not require any photographs and names are pulled straight from the University Euclid system so as soon as the main system is updated this system will be too so if any student is in the process of changing their name or photograph this should happen as soon as the Euclid system is changed without delay. The University is in the process of installing gender neutral toilets where possible and ideally wherever the new team was located this provision would be in place.

Religion or belief – the system asks no information about a student's religion and no photographs are required so any users with a religious belief prohibiting the taking of photographs would not be disadvantaged.

Age, Sex, Sexual orientation, Marriage and Civil Partnership – the system does not ask a student's age or date of birth, sexual orientation or marital/partnership status. The system does record a student's name (but not title) from which a gender or race might be assumed but all staff must complete training in unconscious bias and if it were suspected that any

¹ Note: only the duty to eliminate discrimination applies to marriage and civil partnership. There is no need to have regard to advancing equality or opportunity or fostering good relations in this respect.

inference on gender or race on was being made to influence decisions severe action would be taken in line with the Universities Equality and Dignity and Respect Policies.

Pregnancy and Maternity – the system will be designed to cope with non-continuous periods of study e.g. for instance where someone has taken off time for caring responsibilities or for reasons related to pregnancy or maternity.

Add notes against the following applicable statements:

- On any available information about the needs of relevant equality groups:
We have consulted with the Information Services Disability Information Officer and have begun talks with the Student Disability Service. We also intend to consult with the Staff Disability Officer and Edinburgh Global. The software will be tested for accessibility inline with the Web Content Accessibility Guidelines version 2.1 AA standard as we know disabled users will need the software to be accessible.
- Any gaps in evidence/insufficient information to properly assess the policy, and how this be will be addressed:
At this stage extensive liaison with the Student Disability Service is required to progress, other than this we feel at this stage we have sufficient evidence to proceed.
- If application of this policy/practice leads to discrimination (direct or indirect), harassment, victimisation, less favourable treatment for particular equality groups:
 - People assessing applications could possess biases that they bring into the validation/decision process. Mitigated by creation of a supporting framework intended to improve consistency (compared to current process) across decision-making.
- If the policy/practice contributes to advancing equality of opportunity²
 - The introduction of a consistent framework may reduce the chance of decisions being made on the basis of any unconscious bias and ensure a more consistent student experience.
 - There is the potential for the system to improve the implementation of reasonable adjustment for students and therefore reduce the chance of any disadvantage. It may also help with the monitoring of this and help guide future decisions.
- If there is an opportunity in applying this policy/practice to foster good relations:
 - Demonstrating a framework for consistent decision making should provide benefit by improving student perception of policy-practice. The extensive consideration of any potential impacts positive or negative on any of the 9 protected characteristics will hopefully demonstrate the Universities commitment to Equality and Diversity and how seriously we take these issues. It is hoped that if the system is designed to ease the implementation of adjustments for disabled students this may foster better relations between the University and this protected characteristic.
- If the policy/practice create any barriers for any other groups?
 - The change should not create any barriers for any other groups such as those on low incomes as the University provides free 24-hour access to all staff and students to IT facilities from which they could access the software.
- How the communication of the policy/practice is made accessible to all groups, if relevant?
 - The policy and all communication will be communicated in a variety of formats such as email and websites. All University website communication must meet the University Website Accessibility Policy which requires websites to meet as far as possible the Web Content Accessibility Guidelines 2.1 AA standard. Any user who required information in an alternative format due to a disability would receive this free of charge upon request.

² This question does not apply to the protected characteristic of marriage or civil partnership

- How equality groups or communities are involved in the development, review and/or monitoring of the policy or practice?
 - The project will engage with Student Disability Service, Staff Disability Network and Edinburgh Global during design and build stages. The Information Services Disability Information Officer will test the software for accessibility including compatibility with assistive technology. All feedback will be reviewed for any comments positive or negative related to any of the 9 Protected Characteristics.
- Any potential or actual impact of applying the policy or practice, with regard to the need to eliminate discrimination, advance equality and promote good relations.
 - In addition, the system takes account of temporary injuries which may include temporary hospitalisation or broken limbs etc which may prevent a user from completing the online form it will be possible for a third party to do so on their behalf.
 - As the system will contain sensitive information about student's circumstances and in some cases where a Student is registered with the Student Disability Office, the security and confidentiality of the system will be paramount.

F. Equality Impact Assessment Outcome

Select one of the four options below to indicate how the development/review of the policy/practice will be progressed and state the rationale for the decision

Option 2: Adjust the policy or practice – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations.

- The project is currently in the design/build stage, and therefore expects to adjust its development as it engages with various groups. By the time the project goes live with a new team and system, Option 1 should be applicable. At this time, we need to consult further with key stakeholders such as the Student Disability Service and test the software solution for accessibility.

G. Action and Monitoring

1. Specify the actions required for implementing findings of this EqIA and how the policy or practice will be monitored in relation to its equality impact (or note where this is specified above).
 - Include equality groups in design and implementation stages
 - Implementation of framework (to provide support and guidance in application of coursework extensions, special circumstances and application of assessment adjustments) to provide consistency in decision making
 - Annual review and decision audits
 - Make staff aware of the need for reasonable adjustments and the provision of materials on alternative formats upon request once the system is public
 - Test the software for accessibility in line with the Web Content Accessibility Guidelines Version 2.1 AA standard
 - Review any feedback for any comments positive or negative related to any 9 of the protected characteristics.
2. When will the policy/practice next be reviewed?
 - Following APRC signoff of Coursework Extension and Special Circumstances policy changes, review May 2020
 - May 2020 prior to go-live in June 2020 following system, team and framework sign-off
 - November 2020 prior to December 2020 exam diet and January 2021 Boards of Examiners.

H. Publication of EqIA

Can this EqIA be published in full, now? **No**

If No – please specify when it may be published or indicate restrictions that apply:

- This EqIA is still in draft format and will be updated as the project develops
- The EqIA will be finalised before May 2020 when team/system due to go-live

I. Sign-off

EqIA undertaken by (name(s) and job title(s)):

- Extensions and Special Circumstances (ESC) Project team (Project Manager – Ranald Swanson)

Last reviewed: **29/11/19**

Accepted by (name):

- Lisa Dawson, Head of Student Systems
- Sue MacGregor, Head of Academic Services

[This will normally be the person responsible for the policy/practice named above. If not, specify job-title/role.]

Date: 13.05.19

Retain a copy of this form for your own records and send a copy to equalitydiversity@ed.ac.uk