



Equality Impact Assessment Guidance and Template

This form is intended to help you decide whether an Equality Impact Assessment (EqIA) is needed and, if it is, to carry out the assessment of impact.

Before carrying out EqIA, you should familiarise yourself with the University's EqIA Policy Statement 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 is part of the University's general equality duty under the Equality Act 2010 and the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012. The Equality Act 2010 specifies the following 'protected characteristics': age, disability, race (including ethnicity and nationality), religion or belief, sex, sexual orientation, gender reassignment, pregnancy and maternity, and marriage or civil partnership. This form uses 'equality group' to mean persons who share a relevant protected characteristic.

The University has a general equality duty to have due regard to the **needs** to:

- eliminate discrimination, harassment and victimisation
- advance equality of opportunity
- foster good relations between people who share a relevant protected characteristic and people who do not share it.

Under the Scottish Regulations, the University has a specific duty – subject to relevance and proportionality - to assess the impact of applying proposed new or revised policies and practices against the needs above. 'Policy and practice' should be interpreted widely to include the full range of the University's policies, provisions, criteria, functions, practices and activities, including decisions and the delivery of services – essentially everything we do.

This form is a tool to help with screening and EqIA and is designed to lead you through the process through asking pertinent questions and giving examples. However, the law does not dictate a particular form for EqIA. The requirement is to actively consider how a policy or practice will meet the general equality duty, and take any necessary action. Wherever practicable, EqIA should be built into standard processes and tailored to the nature of the policies or practices involved.

It is, however, necessary to publish EqIA where the policy or practice is applied, so all EqIAs – in whatever format - should be sent to equalitydiversity@ed.ac.uk for publication.

The form includes: some details about the policy/practice; a screening analysis to indicate whether full EqIA is required; and then a number of questions to enable full EqIA.

Answers should be recorded after the questions and the form can be expanded and supplemented as required. Answers may be as long or short as is necessary and relevant, bearing in mind that the effort involved in EqIA should be proportionate to the relevance of the policy or practice to equality.

Once completed, this form will be the record of the screening and, where applicable, the EqIA of the policy or practice. All full EqIAs are published.

<p>A. Policy or Practice (name or brief description):</p> <p>Electronic Point of Sale (EPOS) and Cashless Catering software replacement project</p>
<p>B. Reason for screening (delete as applicable):</p> <ul style="list-style-type: none">Proposed change to an existing policy/practice <p>Update Feb 2016: Review of EqIA</p>
<p>C. Person responsible for the policy area or practice:</p> <p>Name: Ian Macaulay</p> <p>Job title: Assistant Director Accommodation Services (Catering)</p> <p>School/service/unit: Accommodation Services / Corporate Services</p> <p>Update Feb 2016: As above.</p>
<p>D. Screening Analysis</p> <ol style="list-style-type: none">Does the policy or practice affect primary or high level functions of the University? NoIs the policy or practice relevant to the promotion of equality (in terms of the Public Sector Equality Duty 'needs' set out in the introduction above)? YesIs the policy or practice one on which interested parties could reasonably expect the University to have carried out an EqIA? Yes <p>If the answer to any of these questions is 'Yes', an EqIA should be carried out on the proposed/revised policy or practice at an early stage and in any event before it is finalised.</p>
<p>E. Screening outcome</p> <p>Equality Impact Assessment required: Yes</p> <p>Record notes about the screening process or outcome here.</p> <ul style="list-style-type: none">If EqIA is required, note when/at what stage(s) and by whom EqIA will be carried out. <p>This EqIA has been developed prior to the commencement of the new software solution for EPOS and Cashless payment. As part of the procurement an extensive software accessibility section was scored within the award criteria at tender stage to cover both Administrator and User System access of which 50% was mandatory. This is the final EqIA following the signing of contract with the successful tenderer. We are now at implementation stage.</p> <p>Update Feb 2016: This is a review of the EqIA one year on from when the initial EqIA was conducted.</p>
<p>F. Sign-off</p> <p>Screening undertaken by (name(s) and job title(s)): Ian Macaulay - Assistant Director Accommodation Services (Catering)</p>

Accepted by (name): Ian Macaulay

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

Date: 27.01.15

Update Feb 2016: as above

If EqIA is not being carried out, delete the remainder of this form and send the completed form to equalitydiversity@ed.ac.uk.

G. Equality Impact Assessment

Before assessing the policy/practice, ensure that you have a clear understanding of the purpose of the policy or practice, the context, the intended beneficiaries and the results aimed for.

In answering the questions below:

- Bear in mind that the extent of EqIA should be proportionate to the relevance of the policy/practice to equality. It may not be practicable or necessary to answer every question or address every potential scenario.
- Focus mainly on aspects of the policy/practice that are most relevant to the question, to ensure most attention is given to the most important areas.
- Relate answers to consideration of the available evidence and address any gaps or disparities revealed, where feasible without disproportionate effort. For new policies, assess potential impact.
- Describe any action identified to address any issues highlighted.
- Where there is potential for adverse impact, but the policy/practice will still be applied, indicate the rationale for that decision.

Initial/partial EqIA: in some circumstances - particularly for new policies/practices – there may be limited information on which to base EqIA. In these cases, the EqIA should be carried out to the extent possible and should identify arrangements for monitoring/investigation of equality impact and for fuller EqIA in future.

Wholly positive impact: Some policies/practices may be viewed as having only positive equality impact. For these, consideration should still be given to ensure that no adverse impact is overlooked and to ensure that full advantage is taken of the positive impact, e.g. through effective communication. However, the effort involved in carrying out EqIA should not be excessive.

1. Overview. Indicate the current status of the policy/practice or the stage of development/review. Also note any general comments here regarding the relevance and significance of the policy/practice to equality. Which aspects of the policy/practice are particularly relevant (which should be the main focus for EqIA)? On what aspects of equality does the policy/practice particularly impact?

The upgrading of all EPOS tills and cashless catering software within all University in-house managed catering outlets is a central transactional service operating throughout all retail catering and grab and go style operations across multiple University sites. This use of tills are accessible to all staff employed by the University and working in outlets and the cashless system is a payment option available to all staff and students within the University who wish to buy catering, although it should

be noted any purchase is not mandatory nor is the use of cashless catering required over cash or existing debit or credit card chip and pin technologies. In addition, students and staff do have the opportunity to purchase similar products in other higher street private providers around sites.

It is an online system, and acts as alternative payment option should staff or students wish to set up an account (similar to PayPal) for which a range of loyalty and promotions are offered to encourage its use be it through points accumulation or combined meal deal and buy one get one free combinations. However it is a "closed" system available to only staff and students of the University and any account sums loaded can only be spent in the internal University managed outlets.

The current system has been used by the University since August 2011, and is no longer suitable for providing the range of loyalty and promotions combination and user own control both through use of different hardware (tablets and mobile phones) and user software control for registration, card blocking etc.

It has been deemed necessary to follow a full procurement process for a replacement solution, opening our business up to alternative suppliers in this process. This has been on the basis of a "Local Invitation to Tender" as spend over three years is below European Thresholds, however a detailed mandatory selection criteria was built into the first stage of the process prior to award criteria scoring. A UIG was created for this tender drawn from both Accommodation Services, catering, finance and IT and Communication areas.

The successful tenderer scored highest on accessibility during the procurement process.

2. To which equality groups is the policy/practice relevant? Policies/practices applying to substantial groups of students or staff will be relevant to all equality groups, which should be noted. However, also indicate any equality groups for which the policy/practice is particularly relevant, and why.

The protected characteristics under the Equality Act are (delete any that are not relevant):

- Age
- Disability
- race (including ethnicity and nationality)
- religion or belief
- sex
- sexual orientation
- gender reassignment
- pregnancy and maternity
- marriage or civil partnership¹

In answering the questions below consider each of these equality groups. As part of this, consider diversity within, as well as between groups (e.g. different disabilities, different racial groups). Consider the implications of combinations of protected characteristics e.g. issues of relevance to women may vary once race, religion and age are taken into consideration. Also consider the impact on those with caring/family responsibilities (which tends to impact more on women).

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.

As stated above, the EPOS and Cashless Systems will be available to all staff and students at the University, and it is hoped given the attractiveness of the loyalty and promotions offered will be used heavily and have a much higher take up than the current system as will offer greater user functionality and will be more intuitive to use. It therefore has the potential to affect all protected characteristics.

Update Feb 2016 – since the launch of the new system in August 2015 and up to end December 2015 there are now 4215 registered users and 3117 active users who have loaded £208K on the system since its launch. This is in comparison to the old system which ran for 4 years from August 2011 to July 2015 and the maximum number of registered users was 1800.

However, it will be particularly relevant to some disabled users who may require the system to be accessible and/or may rely on assistive technology to access web resources. There is also the potential impact on the protected characteristic of race as the system will only be available in the English language given that English is the main teaching language of the University. AS English is the main teaching language we do not envisage this should cause any disadvantage.

Update Feb 2016 – no issues have been reported regarding accessibility or that the system is only in English nor in regard to any of the other protected characteristics. The Upaychilli system has a dedicated e-mail contact address upay.chilli@ed.ac.uk, which is fully resourced by a Catering Systems Administrator. Any complaints or customer queries are managed through this system as well as any issues reported to the card re-issuing desks across the University who will log this via Unidesk and again this is picked up the catering Systems Administrator. Queries range from newly issues card not working, balance queries, or other functionality matters e.g. if loyalty points are not being added based on purchases etc. To date this has been a very responsive mechanism that has been put in place and is working.

Customer surveys have not been undertaken at this time as the system is too new but a series of roadshows have taken place in the first quarter of 2015/16 across multiple sites and all feedback relating to any of the 9 protected characteristics considered.

3. What evidence is available about the needs of relevant equality groups? E.g. information/feedback from equality groups or other stakeholders, involvement or research with equality groups or individuals, equality monitoring data, service monitoring data, information for other similar policies/practices, staff surveys, research reports, demographic information, audit, inspection or management reports and recommendations.

The Information Services Disability Information Officer (IS DIO) has been involved in writing requirements for the procurement phase of the project, and was involved in evaluating supplier's written responses to these requirements, to ensure the systems were compliant with current accessibility guidelines (WCAG version 2) and compatible with assistive technology.

We have considered and will continue to consider all feedback relating to the introduction of the software; in particular those related to equality and diversity issues.

Update Feb 2016 – the UpayChilli cashless system is accessible through a range of devices including laptops, desktops, tablets and via smart phones (if mobile app

downloaded) and no issues have been reported which relate to any of the 9 protected characteristics. The IS Disability Information Officer will review any changes to the software should this be required in the future.

Where are the gaps in evidence? If there is insufficient information to properly assess the policy, how will this be addressed? If information cannot be gathered now, consider building monitoring into the plans for implementation/review of the policy/practice. Note: the resources put into collecting evidence should be proportionate to the relevance of the policy/practice to equality.

At present we have sufficient evidence to proceed and will continue to monitor feedback and user comments to ensure all issues (either positive or negative) relating to equality and diversity are noted and acted on appropriately.

Update Feb 2016 – no feedback positive or negative have been reported, expect one person with issue with Firefox as a browser but this seemed isolated to their own hardware and had been resolved to ensure full access

As stated above, input relating to equality and diversity requirements of a replacement software solution were incorporated into the requirements documentation for the procurement process.

4. Might the application of this policy/practice lead to discrimination, harassment or victimisation? Might it result in less favourable treatment for particular equality groups or give rise to indirect discrimination?

It may be anticipated that the implementation of this new EPOS and cashless system will simplify user's access to this resource over the current system and catering staff service interactions with the areas of the system needed to perform their role. It would be considered extremely unlikely that the change will lead to any forms of prohibited conduct, and any such risk was minimised/depleted in the procurement evaluation phase. The system will continue to be monitored to ensure that no discrimination occurs.

Update Feb 2016 we have no evidence to suggest any form of prohibited conduct has occurred and given levels of uptake and use of the system over the old system would evidence it has simplified users access/ease of access.

5. Are reasonable adjustments built in where they may be needed?

For any users, who due to a reason related to their disability, cannot use the online system will be able to seek assistance via University staff on campus, or through phoning or emailing the cashless catering dedicated Helpline. All communication about the new system will be available in alternative formats upon request.

Update Feb 2016 – no requests for reasonable adjustments have been received to date to the dedicated cashless catering e-mail, or through any Uni-desk calls or otherwise.

6. Does the policy/practice contribute to advancing equality of opportunity²? Will it help to:
 - remove or minimise disadvantage
 - meet the needs of different equality groups

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

- encourage increased participation of particular groups
- take account of disabled people's impairments?

As part of the procurement requirements, suppliers were asked to respond to a series of questions which indicate their solution's adherence to current accessibility guidance in line with WCAG version 2. This should ensure the system is more accessible than the previous system and takes account of disabled people's impairments and we would hope it will increase participation by disabled users of the University cashless systems and catering outlets in general.

There are a few confirmed improvements as a result of the implementation of the new system.

- No longer a requirement to utilise wall mounted smart service points which will become obsolete and accounts can be accessed from a range of different devices be they mobile phones, tablets or desk tops and users can configure their screen sizes as per windows technology
- Tap and go at till does not require reading any screen as device will be a small black card reader and member of staff can confirm sum to be deducted from account
- Fully integrated chip and pin "verifone" units at all tills in all catering units for those who do not wish to use cashless catering
- Ability to also load a mobile app so can pay with mobile phone if do not wish to use a staff of student card for cashless payment
- Improvements for personal account management so accounts can be checked on the go or at a desk and also ability to block cards should they wish if lost etc.
- Reasonable fulfilment of interface presentation in relation to WCAG version 2 requirements
- Proposed with greater intuitive route through the new system and ease of use will lead to increased usage of cashless catering and therefore improved use on in-house University catering outlets.

Update 2016: Given the increased use of the system and lack of negative feedback it appears that the system has not created any barriers, taken account of disabled persons impairments although the system does not allow us to analyse numbers of users from a specific protected characteristic.

7. Is there an opportunity in applying this policy/practice to foster good relations between people in any protected group and those who are not³? Will it help to tackle prejudice and/or promote understanding?

The Equality Impact Assessment was highlighted to the UIG as part of best practice for project governance. Within the scoring and the specification of the software solution procured careful consideration was fully made to the needs of protected groups specifically, along with all other users of the system. It is hoped that this will promote understanding of equality and diversity and the seriousness with which the University takes these issues.

8. Is there evidence (or an expectation) that people from different equality groups have different needs or experiences in relation to the policy/practice? If so, what are they?

³ This question does not apply to the protected characteristic of marriage or civil partnership.

Some disabled users may require the system to be accessible and/or compatible with assistive technology, and a requirement to this effect was fully covered in the procurement documentation.

Although the system is only in English there should not be an expectation from users that they system will be available in any other language, as the teaching language of the University is English. We will endeavour to support any users who do not speak English in their use of the system via the dedicated cashless catering e-mail/ Helpline.

Update Feb 2016 – see under point 2

9. Is there evidence (or an expectation) of higher or lower uptake by any equality group(s)? If so, give details of the differences and the reasons for these (if known)?

No, we do not expect any lower or higher uptake by any equality group.

Update Feb 2016 – see under point 7

10. Is any equality group excluded from participating in or accessing the service or functions? If so, why?

No, we do not see any group being excluded from participating or accessing the cashless catering function.

Update Feb 2016: There is no evidence of any user being excluded from using the service.

11. Does the policy/practice create any barriers for any other groups? For example, because of the time when the service is delivered or because of restricted income? Is the communication of the policy/practice accessible to all groups?

No barriers are created to any groups in using the system. Whilst the on-line accounts can be accessed 24/7, the amount that a member of staff or student wishes to load is fully within their own control and actual spend can take place in all catering units whilst they are open and this is inclusive to all which also covers access to any promotions or loyalty offers. The system is also accessible for free in any University building with either hardwired desktops or Wi-Fi.

Update Feb 2016: There is no evidence that the system has created any barriers and given the increased rates of participation it seems likely it has reduced barriers.

12. How are relevant equality groups or communities involved in the development, review and/or monitoring of the policy or practice?

The Information Services Disability Information Officer was fully involved in the evaluation of tender at the scoring stage in order to procure the appropriate supplier and solution. We have considered and will continue to consider all feedback relating to the introduction of the software; in particular those related to equality and diversity issues.

Customer surveys have not been undertaken at this time as the system is too new but a series of roadshows have taken place in the first quarter of 2015/16 across multiple sites and all feedback relating to any of the 9 protected characteristics considered.

13. Are there any other points to note regarding the potential or actual impact of applying the policy or practice, with regard to the need to eliminate discrimination, advance equality and promote good relations? If so, note these here.

N/A

H. Equality Impact Assessment Outcome

There is a legal obligation to take account of the results of the EqIA in the development of a new or revised policy or practice. This requires considering taking action to address any issues identified, such as removing or mitigating any negative impacts, where possible, and exploiting any potential for positive impact. Clearly any unlawful discrimination must be eliminated.

Having considered the answers in section G, select one of the four options below to indicate how the development/review of the policy/practice will be progressed. Delete the options that do not apply.

Option 1: No change required – the assessment is that the policy/practice is/will be robust. There is no evidence of potentially unlawful discrimination and all reasonable opportunities to advance equality and foster good relations have been taken, subject to continuing monitoring and review.

State the reasons for this conclusion and the evidence used, if not already included in section G.

The steps relating to the procurement phase (regarding involvement of the IS DIO) and the current plan for implementation, including the risk log and governance structure, suggest that the practice will be robust and there is no evidence of potential unlawful discrimination at this stage. It is clear that the project will use all reasonable opportunities to advance equality and foster good relations, subject to continuous monitoring and review.

Update 2016 – Option 1: for the reasons stated above

I Action and Monitoring

1. Specify the actions required to implement the findings of this EqIA.

- Notify the UIG of the completion of the EqIA.
- Continue to monitor feedback from all customers and catering staff as to the new functionality provided by the software
- Ensure all communication documentation includes a statement informing users that such communication is available in alternative formats.
- Alert staff to possible reasonable adjustments.

2. State how the policy or practice will be monitored in relation to its equality impact (or note where this is specified above).

There was monitoring of equality impact through procurement phase and will continue during implementation.

The IS DIO will be engaged throughout the project, working on behalf of disabled users, and the various academic and student groups involved in the project will be encouraged to feedback proactively.

Update 2016: all feedback will continue to be monitored and acted on accordingly.

3. When will the policy/practice next be reviewed?

The draft EqIA was assessed following the outcome of the procurement phase, resulting in this version published February 2015. This EqIA will be reviewing in February 2016.

Update 2016 – the policy will next be reviewed when there are any changes or updates made or if we receive any positive or negative feedback related to any of the 9 protected characteristics.

J. Publication of EqIA

EqIAs are published on the Equality and Diversity website.

There is a statutory requirement to publish EqIAs within a reasonable period. However, in some circumstances there may be valid reasons to limit what is published or to delay publication.

Can this EqIA be published in full, now? Yes

J. Sign-off

EqIA undertaken by (name(s) and job title(s)): Ian Macaulay, Assistant Director Accommodation Services (catering); Viki Galt, IS Disability Information Officer

Accepted by (name): Ian Macaulay, Assistant Director Accommodation Services [This will normally be the person responsible for the policy/practice named in C above. If not, specify job-title/role.]

Date: 06/02/15

Update Feb 2016 by above.

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