



THE UNIVERSITY *of* EDINBURGH

Equality 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.

School of Divinity

New procedures for safe working in University buildings to control the risks from Covid-19

A. Practice to which this assessment applies:

Change in operations of New College to accommodate social distancing requirements due to the Covid-19 pandemic

(Please note that a separate EqIA has been carried out on Hybrid Teaching and these documents should be considered together)

B. Reason for Equality Impact Assessment:

Proposed change to an existing policy/practice (changing the way the School operates its buildings and facilities to incorporate social distancing guidelines)

C. Person responsible for the policy area or practice:

Name: Prof. Helen Bond

Job title: Head of School

School/service/unit: School of Divinity

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 - YES
- Disability - YES
- race (including ethnicity and nationality) - YES
- religion or belief - YES

- sex - YES
- sexual orientation – YES
- gender reassignment - YES
- pregnancy and maternity - YES
- marriage or civil partnership¹ NO

Terms: **Clinically vulnerable** and **extremely clinically vulnerable** have been used throughout and are important. The NHS definition of these terms can be found on the NHS website: <https://www.nhs.uk/conditions/coronavirus-covid-19/people-at-higher-risk/whos-at-higher-risk-from-coronavirus/>

- All managers should familiarise themselves with the meaning of these terms and the relationship to social distancing/shielding.
- Managers should find out, where staff are willing to share this, all staff that they manage that are in the clinically vulnerable categories for the purpose of effectively assessing social distancing risks. Personal health details should be kept confidential unless agreed to be shared by the individual.
- Individuals classed as [clinically extremely vulnerable](#) will not be able to access the buildings and will be required to continue working from home.

AGE

Age and Clinical Vulnerability - There is evidence that the susceptibility of individuals to Covid-19 increases with age. Robust, consistent operating procedures will reduce this risk and provide reassurance to this group.

Mitigation: Any older individual that is also in the [clinically vulnerable](#) category will have a personal risk assessment.

Age without Clinical Vulnerability - Restricted access to the building and the use of rotas may occasionally require people to work longer hours on a particular day. This may be detrimental to some older individuals.

Mitigation: This will be mitigated through the communication of the clear expectation that staff and students are not compelled to work excessive hours during the day, and that lengthy operations tasks can, where possible, be shared between team members. Additionally, out of hours work will be voluntary for all individuals.

Travel to and from work using public transport may be more difficult and risky for older individuals.

Mitigation: A flexible approach will be taken in respect of arrival and leaving times to allow individuals to avoid peak public transport times. Extended opening hours may be adopted to reduce use of public transport at peak times. The use of other methods of transport when possible will be encouraged (e.g. walking, cycling, private car).

Ability to work/study in a quiet and suitable environment may be harder for Early Career colleagues/PGR students who may have less space in their home environment.

Mitigation: PGR students are being consulted about their preferences and study space will be managed on a rota basis. Similarly staff in shared office spaces, who can't work from home will either be allocated alternative space where possible, or asked to work on a rota basis

DISABILITY

Disability with Clinical Extreme Vulnerability - Individuals classed as [clinically extremely vulnerable](#) will not be able to access the buildings and will be required to continue working from home.

Mitigation: Every effort should be made to ensure that the individual is not disadvantaged in their work.

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.

Where the extremely clinically vulnerable person that also has a disability is a PGR student, consultation with the University's Disability service should take place. Extensions to submission dates for PGR students may need to be sought.

Disability and Clinical Vulnerability – Risks to people that are clinically vulnerable and have a disability should be assessed on a case by case basis.

Mitigation: An individual risk assessment will be undertaken for [clinically vulnerable](#) people. The risk assessment will take into account: their job; use of public transport; social-distancing guidance on minimising contact and maintaining a 2m distance; guidance from their GP. (Note: this process may change depending on guidance from the Scottish Government).

Those living with someone that is [shielding \(clinically extremely high risk\)](#) – Though this person themselves does not need to shield, efforts should be made to ease anxieties via conversation about any practical work adjustments that can be made (e.g. working in a room alone etc), wherever possible.

Impaired mobility - The one-way circulation system implemented to maintain social distancing will create longer walking routes around the building. This could impact negatively on those people with impaired mobility. Lifts will be operational and individuals with reduced mobility will have access to all areas of the building that incorporate teaching and social spaces. Depending upon changes to the building, there may be impacts to evacuation plans.

Mitigation: Individuals with reduced mobility will be allowed to employ the shortest possible route to their destination even when this goes against a one-way system and will have priority access to the lifts. Manager should discuss mobility issues in relation to building plans and agree a new Personal Emergency Evacuation Plan (PEEP) if required.

There will be fewer toilets available in order to ensure social distancing, but the same number of disabled toilets will be available in unchanged locations. However, for some locations longer walking routes to and from toilets will be required as a consequence of the one-way system.

Conditions requiring urgent access to toilet facilities – For example, Irritable Bowel Syndrome, Crohn's disease, those experiencing severe menopause symptoms etc.

Mitigation: Individuals in this group will not need to abide by one-way systems to access the toilets and may take the most direct route. Staff may not wish to (and are not obliged to) disclose this information to managers, but managers should make clear to all staff that this is a policy.

Visual Impairments - Approved signage in the buildings has been produced in consultation with the University's Disability Service and senior university management. The national body – Colour Blind Awareness – has reviewed the signage and approved the visual contrast that addresses all combinations of colour blindness.

Mitigation: Those with visual impairments should be offered an individual risk assessment and a revised Personal Emergency Evacuation Plan (PEEP) if required.

Hearing Impairments – The University is currently “strongly recommending” the use of face coverings for students and staff. Whilst this has significant benefits in reducing the potential for virus transmission, it has a negative impact on the ability of people with hearing impairments to lip read. It is likely that face coverings will be in continued use for a significant period of time.

Mitigation: People with significant hearing impairments who find it difficult to communicate with others wearing face coverings should raise this with their manager in the first instance to discuss how it is affecting their work and interactions with others.

Impact on mental health – COVID-19 has had a significant impact on people's mental health. There are a number of contributing factors, but pertinent to this assessment are concerns about returning to the workplace and also having to work from home and the additional pressures that can bring.

Mitigation: Individuals are encouraged to discuss the impact on their mental health of returning to the workplace or working from home, with their manager. There are also a number of University resources to support individuals including the Staff Health and Wellbeing site, Staff Counselling Service and Occupational Health.

RACE

Data are emerging that suggest BAME individuals can be more vulnerable to COVID-19, due to multiple factors, none, some or all of which may apply to any individual. The School will continue to monitor evidence in this regard and modify our assessments as information arises.

Mitigation: BAME individuals who are concerned that they may be at increased risk can bring this up with their line manager in the first instance, though any line manager who they are comfortable with can be used. Line managers should engage with the individual, taking into account their particular circumstances, to ameliorate risk while at the same time ensuring that individuals are not excluded from undertaking activities or other work that they are able and willing to do.

Harassment due to race or belief – There have been scenarios in Edinburgh and across the country where individuals have been verbally or physically abused due to the perceived origin of COVID-19.

Mitigation: No form of harassment will be tolerated in the School. Any member of staff who is a victim of any kind of racial abuse should immediately make their manager or the Director or Equality, Diversity and Inclusion aware of the situation or report it to the College HR team in the first instance.

RELIGION OR BELIEF

There will be no prayer rooms/ablution areas available - the Sanctuary will be closed.

Mitigation: Any bookable room within New College can be booked for use as a faith space/observance. Ablutions can be completed in any available washroom facility.

SEX

Men – Evidence exists that men, especially those in older age categories, are more vulnerable to COVID-19

Mitigation: Men who are concerned that they may be at increased risk can bring this up with their line manager in the first instance. Line managers should engage with the individual, taking into account their particular circumstances, to ameliorate risk while at the same time ensuring that individuals are not excluded from undertaking activities or other work that they are able and willing to do.

Women – Women are disproportionately represented on some School committees, eg SMG which has continued to meet over the summer. Committee members have been heavily involved in the preparation for S1 and have had less research and rest time over the summer than other colleagues

Mitigation: Line managers should take extra committee work into account when creating staff work plans.

Carers – Many individuals have taken on increased caring responsibilities during the COVID-19 period e.g. childcare, home schooling, elderly care.

There is evidence to show that during the Covid-19 pandemic, women in particular have taken on higher levels of caring responsibilities, e.g. childcare, home schooling, elderly care (<https://www.ifs.org.uk/publications/14861>).

Mitigation: Line managers are required to take caring responsibilities into account when creating staff work plans.

SEXUAL ORIENTATION

Some LGBT+ people may be hiding aspects of their lives from people that they are living with, or be forced to shelter in situations where their identity is not fully accepted. The requirement to continue to work from home may cause disproportionate feelings of isolation

and mental health and wellbeing problems for LGBT+ people.

Mitigation: LGBT+ individuals who are concerned that they may be at increased risk can bring this up with their line manager in the first instance, though any line manager who they are comfortable with can be used. Additionally, concerns can be raised confidentially with the School's Director of Equality, Diversity & Inclusion (Dr Philippa Townsend).

GENDER REASSIGNMENT

There is evidence that the lack of explicit gender-neutral facilities in higher education institutions causes indirect discrimination, and increases the risk of harassment for individuals who have undergone gender reassignment in addition to non-binary staff and students.

Mitigation: There will be fewer toilets available in total in order to ensure social distancing, but the same number of gender-neutral toilets will be available in unchanged locations, with the possibility of further options. Individuals who are concerned about impacts to them arising from new social distancing plans that related to their gender reassignment can bring this up with their line manager in the first instance, though any line manager who they are comfortable with can be used. Additionally, concerns can be raised confidentially with the School's Director of Equality, Diversity & Inclusion (Dr Philippa Townsend).

PREGNANCY AND MATERNITY

Pregnant women have been included in the list of people at moderate risk ([clinically vulnerable](#)) as a precaution. The School will comply with health and safety and absence leave requirements for pregnancy and maternity. A risk assessment will be undertaken for all pregnant workers and new mothers, regardless of how many weeks' gestation. The risk assessment will take into account: their job; any pre-existing health conditions; use of public transport; social-distancing guidance on minimising contact and maintaining a 2m distance.

OTHER AVAILABLE INFORMATION ABOUT THE NEEDS OF RELEVANT EQUALITY GROUPS:

The threat posed by COVID-19 is without recent precedent, with all areas of the University affected. To this end, the School's Director of Equality, Diversity & Inclusion will represent the School on the CAHSS EDI Committee to ensure that emerging information about protected groups is incorporated into School plans. In addition, the School's Director of Professional Services and Resources Officer have access to shared CAHSS Teams sites looking at the impact of Covid19.

The evidence for impacts on protected groups will change as new information becomes available. The School will keep up to date, via the information flow from College, with information and incorporate new evidence of equality impacts as they arise. We will be monitoring particularly the UK government inquiry findings: "Unequal impact: Coronavirus (Covid-19) and the impact on people with protected characteristics" which will look especially at impact relating to gender, disability and BAME individuals <https://committees.parliament.uk/work/227/unequal-impact-coronavirus-covid19-and-the-impact-on-people-with-protected-characteristics/>

- **Are there gaps in evidence/insufficient information to properly assess the policy, and how this be will be addressed:**

The gaps in evidence for assessment of this policy will be filled by consulting continuously with protected characteristic groups as this practice is implemented and changed in response to the Scottish government guidelines.

- **Could application of this policy/practice lead to discrimination (direct or indirect), harassment, victimisation, less favourable treatment for particular equality groups?**

The implementation of this new practice has the potential in a number of ways outlined in the document, and potential ways not identified, to impact indirectly on equality. These

potential impacts are justified in achieving the aim of protecting staff and students from COVID-19. The indirect risk is mitigated by measures aimed at allowing individuals in one or various groups to take a more flexible approach to their work. In addition, we encourage any individuals who notice that their circumstances have deteriorated and who are not included here to reach out to their line manager, or any line manager with which they feel comfortable.

- **Will the policy/practice contribute to advancing equality of opportunity² ?**

The new practice should enable staff and students from all protected characteristic groups to resume research and other activities in support of research.

Is there an opportunity in applying this policy/practice to foster good relations?

Applying this practice and ensuring its good communication will provide reassurance to **all** staff and students that their health, safety, and well-being are being prioritised, and that issues of equality have been carefully considered. Continued support for staff to work from home and work flexibly can foster good relations with those for whom these flexible working practices allow them to maintain good work-life balance.

- **Will the policy/practice create any barriers for any other groups?**

No other protected groups will be affected, but there will be some inherent inequity imposed by the social distancing requirements. Groups in smaller spaces will inevitably have more severe restrictions on the number of individuals that can access spaces than similarly sized groups with larger spaces. Some staff will come back to campus in order to fulfil the requirements of their role, however others will be able to continue working from home full time.

PhD students and postdoctoral fellows near the end of their studies/contracts have been particularly negatively impacted by the closure of the buildings, particularly the libraries, as they have been unable to complete their work. As such we wish to prioritise access for these individuals so they may complete their work.

Finally, many students and staff will see the amount of time they spend working from home increasing well above pre-pandemic levels for the duration of the requirement of social distancing. While some individuals may find this advantageous, others will not. In addition to allowing, once buildings are able to re-open, individuals to retrieve items from offices to ensure a more comfortable and safe home-working environment, there are a number of mental health and homeworking resources available on the University website:

<https://www.ed.ac.uk/staff/health-wellbeing> and

<https://uoesharepoint.com/sites/Covid19/SitePages/Homeworking-%26-working-on-University-premises%E2%80%99.aspx>.

- **How will communication of the policy/practice be made accessible to all groups, if relevant?**

This policy will be available on the School sharepoint, with particularly important information communicated via email. Printed versions will also be available for those that require them.

- **How are equality groups or communities involved in the development, review and/or monitoring of the policy or practice?**

The following were directly involved in the development of this policy: Head of School, Director of Equality, Diversity & Inclusion and the Director of Professional Services.

In matters related with the following protected characteristics, the following were asked for comment:

- Race and Ethnicity - University Edinburgh Race Equality Network (EREN)
- Religious Belief – University of Edinburgh Chaplaincy – Honorary Muslim Chaplin and Muslim Belief Contact

Head of School and the Director of Equality, Diversity & Inclusion have been in ongoing conversations and consultation with the CAHSS EDI committee regarding issues raised in this statement. Further feedback will be sought and encouraged on an on-going basis, and substantive issues will be reported to the School Management Group.

A Q&A session is taking place at the end of August for all staff and research students with questions and answers posted on Sharepoint. Information for UG and PGT students will be disseminated via Welcome Week. GH Tutors will receive communications via their paid tutor training.

The policy will be monitored continually after implementation and factors re-evaluated as governmental and University policy is revised over time. Policy modification will be approved via the Director of Professional Services (for local decisions and building-wide modifications), or via Head of School for any change in policy affecting the entire School.

- **Is there potential or actual impact of applying the policy or practice, with regard to the need to eliminate discrimination, advance equality and promote good relations?**

Applying this practice and ensuring its good communication will provide reassurance to all staff and students that their health, safety, and well-being are being prioritised, and that issues of equality have been carefully considered.

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 1: No change required – the assessment is that the policy/practice is/will be robust.

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.

Option 3: Continue the policy or practice despite the potential for adverse impact, and which can be mitigated/or justified YES

Option 4: Stop the policy or practice as there are adverse effects cannot be prevented/mitigated/or justified.

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).

The EqIA will be sent to all academic and professional staff and research students by email. For Professional Services, the Director of Professional Services will undertake a review with her own teams.

It will also be referenced at the all-staff Q&A session (26th August) and links will be included in the building re-opening documentation. All colleagues will be encouraged to contact their line manager should their circumstances change.

The system for monitoring the impact of the policy has largely been described in section 'How equality groups or communities are involved in the development, review and/or monitoring of the policy or practice?' and will include inviting feedback from affected groups. Comments will be discussed at the Senior Management Group and changes made as needed.

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

The policies will initially be reviewed one month after implementation by Head of

School, Director of Equality, Diversity & Inclusion and Director of Professional Services..

After that the policy will be re-visited as anticipated changes in policies at the government or University level are implemented, or as and when feedback necessitates a review of the policy.

H. Publication of EqIA

Can this EqIA be published in full, now?

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

Yes. Due to the urgency of need, the EqIA will be published as soon as possible in order to provide guidance in tandem with anticipated changes that will come from Government. Changes to the EqIA are expected as more information regarding impact and feedback is received and the School intends to act responsively.

I. Sign-off

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

Prof. Helen Bond (Head of School)

Dr. Philippa Townsend (Director of Equality & Diversity)

Louisa Grotrian, Director of Professional Services

Accepted by (name): Prof. Helen Bond

Date: 10/09/2020

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