



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): **Data Protection Impact Assessment software**

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

- Proposed new policy/practice **No**
- Proposed change to an existing policy/practice **Yes**
- Undertaking a review of an existing policy/practice **No**
- Other (please state):

C. Person responsible for the policy area or practice:

Name: **Dr Rena Gertz**

Job title: **Data Protection Officer**

School/service/unit: **University Secretary's Group**

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

The new software simplifies a mandatory requirement of the new data protection legislation. It is applicable for all staff members throughout the University that handle personal data in any way. It therefore has the potential to impact on all 9 of the equality groups, however, the group that this change will potentially have the greatest impact on is disability. The software is relevant to disabled users, who may rely on assistive technology to access both the software and the guidance, and/or who require the system to meet current accessibility guidelines. The equality group of 'race' is also relevant as the software and guidance will only be available in English. However, as English is the main language of the University, we would not envisage any disadvantage. We do not envisage any positive or negative impact on any of the other equality groups but will monitor feedback from users in case any issues come to light.

Add notes against the following applicable statements:

- On any available information about the needs of relevant equality groups: **The Information Services Disability Information Officer was consulted and tested the software for its compliance with the latest version of the Web Content Accessibility Guidelines AA standard and noted areas where the software fails to comply. We are in discussions with the supplier to improve these issues as soon as possible, (reasonable adjustments will be in place in the meantime as discussed below). We will monitor all feedback for any comments related positively or negatively to any nine of the protected characteristics and act accordingly. Also, several members of staff were asked to test the tool.**
- Any gaps in evidence/insufficient information to properly assess the policy, and how this be will be addressed: **At this stage we feel 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: **We do not envisage that this software and guidance will lead to any form of prohibited conduct. All steps have been put in place to ensure the software and guidance is as accessible and compatible with assistive technology as possible to disabled users. Reasonable adjustments will be put in place where appropriate to ensure no disadvantage, for instance offering the training in an alternative method such as face to face. Where a member of staff was unable to use the software for a reason related to a disability and we could not rectify this, reasonable adjustments such as offering the form in an alternative format or offering the member of staff assistance to complete the form would be provided. We have already been in discussions with the suppliers of the software about the accessibility changes we would like implemented.**
- If the policy/practice contributes to advancing equality of opportunity² **The planning and development of the software has taken accessibility into consideration from the beginning and has been tested by the University's Disability Information Officer to ensure that it takes accounts the needs of disabled people. As the software is managed centrally it is easier to control**

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.

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

accessibility issues from the outset, however, we may need to rely on the supplier for certain amendments. The change is intended to streamline a procedure that so far has been time-consuming and has led to the number of completed assessments becoming too large for a structured database. Continuing with the old system would lead to duplication of efforts due to the database not being properly searchable. While no direct effect on accessibility, this is an overall improvement which was the focus of and intention of the system.

- If there is an opportunity in applying this policy/practice to foster good relations: **The software will ensure that all staff are better equipped to comply with new data protection legislation and thus a breach and possible fine can be prevented. Promotion of accessibility will be part of the support. We hope that by demonstrating our commitment to considering equality issues and taking account of the needs of various protected characteristics we will demonstrate our desire not only to meet our needs under the legislation but to promote good practice and therefore prompt and foster good relations.**
- If the policy/practice create any barriers for any other groups? **Only staff that have PC access as part of their role may at some point be in the position of having to complete a DPIA. These staff have free 24 hour access to IT facilities so there should be no disadvantage for those on low incomes.**
- How the communication of the policy/practice is made accessible to all groups, if relevant? **Communication is done through the data protection champions and through an established link on the records management website, a link that has been in use for the old word document-based system and is therefore well-known. The guidance will be provide in alternative formats free of charge to disabled users as required. The University web estate is governed by the University Web Accessibility Policy which is based on compliance with the Web Content Accessibility Guidelines 2,1 AA version**
- How equality groups or communities are involved in the development, review and/or monitoring of the policy or practice? **All feedback from users will be gathered and analysed to note any potential positive or negative impacts on the 9 protected characteristics that need to be addressed. The Information Services Disability Information Officer has been consulted and will continue to be involved where appropriate.**
- 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: **None other than what is mentioned above**

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 will be robust. For the reasons given above.

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).

All feedback from users will be gathered and analysed to note any potential unexpected positive or negative impacts that need to be addressed. Staff will be made aware of the need to make reasonable adjustments and to provide documents in alternative formats.

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

When new guidance by the Information Commissioner's Office is issued, when new legislation is introduced, when we ask the supplier to make any substantial changes to the software or when we receive any positive or negative feedback related to any of the nine protected characteristics.

H. Publication of EqIA

Can this EqIA be published in full, now? **Yes**

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

I. Sign-off

EqIA undertaken by (name(s) and job title(s)): **Dr Rena Gertz, Data Protection Officer, University Secretary's Group**

Accepted by (name): **Tracey Slaven, Deputy Secretary, Governance and Strategic Planning**

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

Date: **15 June 2019**

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