



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):

The University is moving from hard-copy employee records to digital employee records. To hold the files and facilitate the access and recall of information a structured digital filing solution has been developed for the University using Sharepoint.

For all existing employees the contents of the hard-copy personal files held for them will be scanned and placed into a unique digital record held in the Sharepoint solution. As new employees join the organisation a unique digital record will be created to hold all required information related to their employment with the University.

By June 2019 all employee files will be digitised.

Moving to digital records offers significant benefits including increased security of data, clarity over retention in relation to GDPR requirements and savings in relation to storage space, paper/printing costs ensuring a reduction in our carbon footprint.

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

- Proposed new policy/practice - **yes**
- Proposed change to an existing policy/practice **yes**
- Undertaking a review of an existing policy/practice
- Other (please state):

C. Person responsible for the policy area or practice:

Name: **Susan McNeill**

Job title: **Project Sponsor**

School/service/unit: **Service Excellence Programme**

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: The transition to digital files is relevant to all groups with protected characteristics as existing hard-copy files already contain information which has been provided for legitimate purposes.

Information on all Protected Characteristics is obtained at the point of recruitment and such information required for the purposes of Equality and Diversity Monitoring is held on the University's established Personnel Management System (PMS). Where additional information is held on file (either digital or hard-copy) it is held in compliance with legal requirements or because information has been provided by the employee for a specific purpose such as accessing their entitlement to benefits such as maternity pay or occupational sick pay. Further details relating to each PC follow:

Access to digital records is tightly controlled and audited with only approved users having authority to access the filing system. Items of information deemed to require extra protection are stored in a section of the file structure which enhanced access controls.

- **Age**

Information held on the digital file will include the employee's age and date of birth. This information is currently held on employees' hard-copy files and is obtained to ensure that the University complies with the legal obligation to ensure that all employees have the right to work in the UK. This is usually evidenced by taking and retaining a copy of the passport or birth-certificate.

- **Disability**

Where an employee advises that they have a disability any necessary information will be held on file in a section of the digital record that has enhanced access controls. As with the current hard-copy information the only information held on file will be in relation to agreed adjustments or specific requirements to accommodate a disability. The move to digital files will not change the ease with which employees can advise on a disability as this will continue to require interaction with an HR Advisor.

An employee seeking access to their employment file must make a subject access request, they are then given a copy of the content of their file. The digital files have been tested for accessibility and will be available in alternative formats if an eligible disabled user required access to them.

- **race (including ethnicity and nationality)**

Information held on the digital file will include the employee's nationality. This information is currently held on employees' hard-copy files and is obtained to ensure that the University complies with the legal obligation to ensure that all employees have the right to work in the UK. This is usually evidenced by taking and retaining a copy of the passport or birth-certificate.

The Sharepoint solution through which the files are accessed is written in English. English is the main teaching language of the University and the employees working who will be the main users of the system must be competent in both verbal and written English for all aspects of their role and so the use of English will not be a barrier.

- **religion or belief**

Files may hold this information if it has been provided and held on the hard-copy record. It is unlikely that the majority of files will hold such information unless it relates to a specific issue directly relevant to the individual's employment in which case such information would be contained in the section of the file requiring enhanced access.

- **sex**

Information held on the digital file will include gender. This information is currently held on employees' hard-copy files and is obtained to ensure that the University complies with the legal obligation to ensure that all employees have the right to work in the UK. This is usually evidenced by taking and retaining a copy of the passport or birth-certificate.

The digital file naming convention does not use titles associated with gender.

- **sexual orientation**

Information held on the digital file may hold information on sexual orientation if this has been provided by the employee for a specific reason, in which case it would be contained in the section of the file structure requiring enhanced access. It is unlikely that the majority of files will contain any information which would identify an individual's sexual orientation.

- **gender reassignment**

Information relating to gender re-assignment will be held in the digital file. As with hard-copy files the information that can be legitimately held is very limited and would be held in the section of the file structure requiring enhanced access

- **pregnancy and maternity**

Information relating to pregnancy and maternity will be held in the digital file. Such information is held in relation to the employee's entitlement to occupational benefits and held in compliance with best practice / records management guidance around retention periods

- **marriage or civil partnership¹**

Information may be held on marriage or civil partnership where this has been provided for a specific purpose by the employee.

- On any available information about the needs of relevant equality groups:

Consultation was limited to 9 open-meetings held across the University to explain the digitisation process and to ensure any privacy concerns such as controls for protecting unauthorised access were identified and addressed. The Information Services Disability Information Officer was consulted and the electronic documents reviewed for accessibility including compatibility with assistive technology.

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

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.

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 believe that this change will lead to any form of prohibited conduct. The Sharepoint Solution holding the digital files has strict access/privacy controls. The use of digital records in preference to hard-copy records ensures that information provided by employees' relating to any protected characteristic is securely and legitimately held. Audit trails will ensure that unauthorised access can be identified this offers additional security not possible where information is stored in hard-copy files.

- If the policy/practice contributes to advancing equality of opportunity²

The digitisation of files will not contribute directly to enhancing equality of opportunity. The move to digital records neither reduces nor enhances the ease with which an employee can access information held on them or the organisation's ability to analyse / use information provided. However, all information provided on PCs is entered onto the PMS and available for such purposes. In accordance with data protection requirements an employee wishing to view the content of their personnel file must submit a subject access request (SAR) – this requirement exists in relation to both hard-copy and digital files.

The move to digital records will improve the quality of record keeping and compliance with the General Data Protection Regulations

- If there is an opportunity in applying this policy/practice to foster good relations:

The move to digital records will improve the quality of record keeping and compliance with the General Data Protection Regulations this will provide additional reassurance to employees that their personal information is being stored and managed securely. By considering any impact this change will have on the protected characteristics it is hoped this will demonstrate the commitment IS and the wider University has to Equality and Diversity.

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

Staff who are involved in the digitisation of records and the ongoing use of the Sharepoint Solution have been/ will be provided with training and support to ensure they are able to create, access, upload and archive documents / files according to agreed privacy/security protocols. Training will be provided on a variety of days in accessible locations to avoid creating any disadvantage. Any reasonable adjustments staff may need to attend the training will be made. The transition to a digital filing system does not create barriers for any groups of staff as the methods of requesting access to personal information held on file remains the same. The University provides free 24 hour access to all staff to all IT facilities so there should be no impact for those on low incomes.

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

Regular updates on the File Digitisation Project have been issued via the Service Excellence Website. The University web is governed by the University Web Accessibility Policy which is based on the Web Content Accessibility Guidelines AA standard. Information on the change will be provided in alternative formats upon request free of charge for disabled users.

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?

Staff have been consulted about the change and can offer feedback. The Information Services Disability Information Officer has been involved in reviewing the EqIA and looking at the forms from the point of accessibility. All feedback will be monitored for any positive or negative feedback related to any of the nine protected characteristics and acted on accordingly.

- 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:
Nothing other than that noted 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 is/will be robust.

For the reasons stated above.

The digitisation of employee records will ensure that a single ‘gold copy’ digitised employee file will maximise the reliability and security of information held. Access controls will limit access to authorised users and audit trails will ensure the safety and security of information. Triggers built into the system will flag when a document should be removed from the file so ensuring compliance with the General Data Protection Act. Employees will still be able to ask for and have provided copies of information, e.g. letters, contracts. Using the same methods as they do when requesting information from a hard-copy file.

For those who administer and manage employee information the system will ensure that all information especially sensitive information relating to a protected characteristic cannot be inadvertently accessed by a non-authorised user. At the moment file controls are localised and it is not possible to guarantee that all employee information is held securely in such a way as maintains absolute privacy of sensitive information.

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 system has inbuilt audit trails which will be monitored allowing unauthorised access to be identified and investigated.

Staff responsible for managing / accessing records and receiving requests for information are aware of the need to make reasonable adjustments and to provide information in alternative formats upon request,

Feedback on all aspects of the digital filing system will be sought and monitored to ensure any concerns regarding the retention / accessibility of personal information related to the 9 protected characteristics is noted and addressed.

If the IT systems supporting this change are updated or altered we will retest them for accessibility in terms of compliance with the Web Content Accessibility Guidelines AA standard including compatibility with assistive software.

2. When will the policy/practice next be reviewed? **The Sharepoint Solution is an interim solution pending the implementation of the new Finance, Payroll and HR system for the whole University and the management of digital files will be reviewed as part of the integration process with the new system and the EqlA updated then. Full implementation of the new system is expected to take place during 2020/21**

H. Publication of EqlA

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

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

I. Sign-off EqlA undertaken by Susan McNeill, Head of HR for CMVM and Project Sponsor for File Digitisation on Human Resources Transformation

Accepted by (name):

Susan McNeill – Project Sponsor / File Digitisation

Date: **26 April 18**

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