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.

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

Practice.

Redevelopment of IT system which is used to support Health & Safety Department to record Accident & Incident Reporting across the University. The redevelopment of their existing Accident & Incident reporting web based form which is submitted to a backend MS Access database to an EASE authenticated web application on supported infrastructure.

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B. Reason for screening (delete as applicable):

Proposed change to an existing policy/practice

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C. Person responsible for the policy area or practice:

Name: Alastair Reid

Job title: Director of Health and Safety

School/service/unit: Health and Safety Department

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D. Screening Analysis

1. Does the policy or practice affect primary or high level functions of the University? Yes
2. Is 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)? No
3. Is the policy or practice one on which interested parties could reasonably expect the University to have carried out an EqIA? Yes

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.

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E. Screening outcome

Equality Impact Assessment required: Yes

Record notes about the screening process or outcome here.
- If EqIA is required, note when/at what stage(s) and by whom EqIA will be carried out.

    The EqIA will be carried out at the development stage and updated as the project develops. It will be carried out by Karen Stirling.

    Review April 2015 – the system has not been altered and that there has been no feedback (positive or negative) related to the system that is pertinent to any of the 9 protected characteristics and no reasonable adjustments were required.

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F. Sign-off

Screening undertaken by (name(s) and job title(s)):   Karen Stirling, Project Manager/Business Analyst

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Accepted by (name): Alastair Reid Director of Health and Safety (as confirmed by Candice Schmid)

Date: 04/03/2014

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 existing Accident & Incident Reporting application has been available to public, staff and students across the University for a number of years and is now being redeveloped to design, develop and deliver an on-line application for recording Accident & Incident reports and deliver a reporting mechanism capable of providing standard reports in a format that is acceptable for RIDDOR and USHA / HESA.

This development will be implemented by 28th February 2014.

The Accident & Incident Reporting is important to the University to record any accident injuries and non-injury incidents that have been encountered across the University estate and the data collected aligns with key legislation and regulation which requires to be captured for the following:

- Data Protection, 1988 (DPA) – data requires to be held for 7 years
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulation, 1995 (RIDDOR) – Health records information requires to be made available for 40 years
- Occupational Ill Health

The redevelopment of the application is collating / storing the same or similar data already captured by the existing web form.

The main focus of the EqIA will be on the accessibility of the online form for disabled users as this is the protected characteristic most likely to be affected by the change.

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 partnership[1]

   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).

   Accident & Incident Reporting is available to the public and to all staff and students at the University and therefore it has the potential to be relevant all groups. However the system is most likely to be of relevance to the protected characteristics of disability and race. It is particularly relevant to some disabled users who may rely on assistive technology to access the application form. The system is in English only as this is the main teaching language of the University.

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

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[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.

recommendations.

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.

The Information Services Disability Information Officer (IS DIO) will complete a detailed accessibility review of the Accident and Incident Reporting application and will continue to review the accessibility of all new developments.

We have taken the view that because this is an upgrade to an existing service, and the IS DIO will carry out a comprehensive accessibility testing, it would not have been proportional to involve users from protected groups directly at this stage. However, we will monitor feedback from users and review this approach to evidence gathering where appropriate.

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?

We do not believe the application will lead to discrimination as we have extensively tested the application to make it as accessible as possible to disabled users and put in place reasonable adjustments where necessary

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

Where an individual is unable to use the online system for any reason they will be able to complete a paper version of the form which will be manually inputted into the system on their behalf. All communication regarding the upgrade will be available in alternative formats upon request.

6. Does the policy/practice contribute to advancing equality of opportunity[2]? Will it help to:
   - remove or minimise disadvantage
   - meet the needs of different equality groups
   - encourage increased participation of particular groups
   - take account of disabled people's impairments?

The system will be more accessible for disabled users than the previous system which should remove disadvantage and encourage participation from some disabled users,

7. Is there an opportunity in applying this policy/practice to foster good relations between people in any protected group and those who are not[3]? Will it help to tackle prejudice and/or promote understanding?

A more accessible system and clear information on the accessibility of the system will hopefully illustrate to all the seriousness with which Edinburgh University considers Equality and Diversity issues and especially in this case the protected characteristic of Disability.

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?

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

A proportion of disabled users will require the system to be accessible (in terms of current WCAG version 2 guidelines) and to be compatible with assistive technology. As the main teaching language of the University is English the system will only be available in English.

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

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

    No

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?

    We do not believe that the policy should create any barriers. We will ensure that all communication regarding the upgrade will be available in alternative formats upon request and have put in place reasonable adjustments to ensure no none is excluded.

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 is reviewing the accessibility of the system for disabled users. In addition all feedback will be monitored and acted upon to ensure there is no negative impact on any protected characteristics.

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.

    No

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.
We believe the system will not have any negative impact on any of the 9 protected

characteristics and should improve accessibility of the system for disabled users. Where necessary reasonable adjustments have been put in place to try and ensure no disadvantage will occur.

I Action and Monitoring

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

    Staff will be informed about the reasonable adjustments such as the requirement that individuals unable to complete the online version will be able to complete a paper copy and the need to provide information in alternative formats upon request. The accessibility evaluation of the upgrade will be considered and changes made where necessary and information on the accessibility of the system will be provided.

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

    All feedback will be monitored to see if any issues regarding equality and diversity are being highlighted

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

    Review April 2015 – the system has not been altered and that there has been no feedback (positive or negative) related to the system that is pertinent to any of the 9 protected characteristics and no reasonable adjustments were required.

    Next review when system is changed or updated significantly.

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

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

J. Sign-off

EqIA undertaken by (name(s) and job title(s)): Karen Stirling, Project Manager / Business Analyst. Review undertaken by Candice Schmid, Health and Safety Department

Accepted by (name): Alastair Reid, Director of Health and Safety
[This will normally be the person responsible for the policy/practice named in C above. If not, specify job-title/role.]

Date: 04/03/2014/ Reviewed date: 14/04/2015

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