



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):

Website auditing service

This EqIA relates to the procurement and implementation of a tool for website auditing of the University of Edinburgh's web estate. For the purpose of this paper, the web estate is defined as websites under the technical and legal ownership of the University of Edinburgh. This EqIA should be read alongside the EqIA on the Website which can be found at:

http://www.docs.csg.ed.ac.uk/EqualityDiversity/EIA/IS-University_Centrally_Managed_Public_Facing_Website.pdf

The tool will perform checks in the following high-level areas:

- Technology
- Data collection
- Content
- Accessibility
- Security
- Infrastructure

The will lead to the delivery of a service to scan the University of Edinburgh web estate on a rolling basis, including technical information and benchmarking as outlined in the procurement requirements. This will include, where is deemed appropriate by the Information Services Disability Information Officer, scanning of websites for accessibility issues. Equally, the tool itself must be accessible for disabled users in terms of compliance with the Web Content Accessibility Guidelines AA standard including compatibility with assistive technology.

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

- Proposed new policy/practice – **YES**
There is currently no tool in place to scan websites on an automated basis.
- Proposed change to an existing policy/practice
- Undertaking a review of an existing policy/practice
- Other (please state):

C. Person responsible for the policy area or practice:

Name: Jonathan Trout

Job title: Head of Web Strategy

School/service/unit: Learning, Teaching & Web, Information Services

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 lack of corporate knowledge around the quantity and quality of websites puts the University in a position of risk in relation to meeting regulatory and legal standards (such as information security and privacy legislation compliance), reputational damage, cost inefficiencies and loss of income. The University's Chief Information Officer has therefore requested that solutions are found to better manage these risks and work towards the long-term improvement of user experience.

The adoption of the tool has a potential impact for all users of web services and therefore all protected characteristics. All users from all protected characteristics have the potential to experience a positive impact from this policy as by ensuring the website is up to date and reviewed should mean the information on the website is accurate. Therefore if a user were looking for information on for example how to contact the Staff Disability Officer or on crèche facilities etc this should all be up to date. In addition, the tool is part of a redevelopment of the web which is intended to each page having a web owner recorded and so if a website were found to include any content that was discriminatory, offensive or against the University Dignity and Respect Policy we would know who to contact to remove this content and take disciplinary action as appropriate.

Disability may be impacted on positively as it is planned that the automatic tool will include superficial accessibility checking which will be used as a starting point for addressing web pages with poorer accessibility or where they might fall short of the University Web Accessibility Policy which is based on the latest version of the Web Content Accessibility Guidelines AA standard. We recognise that automated accessibility testing on its own is not sufficient but will provide us with a base line. In particular, a request has been made that the tools can, at a minimum detect that:

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.

- All colour contrasts meet WCAG AA standard
- All images and icons have text alternatives
- Tables are correctly formatted to indicate header rows/columns etc
- Does it require Java Script?
- Minimum text size met
- PDF/Word attachments are accessibly
- No flashing or scrolling text
- No time limits

In addition, the tool itself that is procured must be as accessible as possible and the Information Services Disability Information Officer has tested that not only is the automatic accessibility function of the tool satisfactory but to ensure the tool itself is as accessible as possible.

The website is in English but as English is the main teaching language of the University and it is possible to use certain browser plug ins to convert the web pages to different languages we do not believe this will lead to any disadvantage. This issue and general website accessibility issues are discussed in more depth in the IS University Centrally Managed Public Facing Website EqIA which should be read in tandem with this EqIA and can be found at:

http://www.docs.csg.ed.ac.uk/EqualityDiversity/EIA/IS-University_Centrally_Managed_Public_Facing_Website.pdf

The University of Edinburgh owns and manages the domain www.ed.ac.uk but a devolved approach in managing the University web estate has resulted in a growth of websites and associated web applications. An audit of University infrastructure in September 2017 found circa 1,700 websites.

The website domains are split between circa 1,400 sub-domains (for example, law.ed.ac.uk) and top-level domains (for example, www.mediblog.ed.ac.uk) depending on the business unit's affiliation to the University. The suppliers, technology base or quality of these solutions is not scanned regularly on an ongoing basis by ISG or other Support Departments within the University.

The primary issues identified are:

- Poor user experience causing user dissatisfaction and attrition
- Unknown website quality and potential issues with accessibility and related impact on selected equality groups
- Uneven technical configuration and outdated technologies resulting in vulnerabilities and security risks
- Content quality and duplication issues impacting search engine performance and user experience

The improvement of the solution quality, integrity and security of the web estate is a key objective of the University's Web Strategy. .

The website scanning tool will be a Software as a Service, cloud-based tool.

The tool will be accessed and used only by authorised University of Edinburgh staff, namely:

- Head of Web Strategy(Information Services Group – ISG)
- Head of Website & Communications Technologies(ISG)
- Information Security Team (ISG)
- Disability Information Officer (ISG)
- CIO (College of Arts Humanities and Social Science)
- IT Liaison (College of Science & Engineering)
- Head of College IT (College of Medicine & Veterinary Medicine)

The results, as appropriate, will be made available to the Web Governance Group, who are recognised in the University's committee structure and report to the Information Technology Committee. The University's Web Governance Group is the executive body with overall accountability for the web estate.

The core responsibilities of the Web Governance Group are to:

- Oversee the University's web activities on behalf of the Information Technology Committee
- Oversee the development and delivery of the Web Strategy
- Champion web standards, best practice and technology approaches across the University
- Ensure web capabilities, tools and resources are shared appropriately across the University

The results from scanning will be used to:

- Better understand the quality of the web estate
- Produce management information reports for the Web Governance Group
- Identify threats or risks to the web estate which should be escalated to website owners
- Identify wider areas of underperformance or compliance, against which strategic improvement projects should be developed
- On any available information about the needs of relevant equality groups:

All users from all protected characteristics have the potential to experience a positive impact from the adoption of this tool as there is the potential to enhance the quality and accessibility of websites.

Consultation on the processes and issues around the web estate has taken place with colleagues from across the University, including Strategic Programmes; Information Services Disability Information Officer; College IT Teams; Information Security; Internal Audit; and Professional Services Groups. Members of these groups include individuals from a range of protected characteristics. Full details are available in the Web Strategy Wiki – visit <https://edin.ac/2LBvjBh> for further information.

- 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 believe that this policy will result in any form of prohibited conduct as no protected characteristics should experience any negative impact as we believe the use of a scanning tool will only result in improvements in website quality and accessibility and the potential positive effects associated with this as discussed in this EqIA.

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

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

Allied to other web initiatives (such as identifying owners for websites), the adoption of the scanning tool will help to improve user experience broadly and also for particular protected characteristics. For example, ensuring websites are accessible for disabled users may be better achieved if the tool can give an indication of websites which currently underperform in this area. Whilst we recognise that an automated accessibility checking system will never be able to check fully the accessibility of the site and will generate false positives and negatives it is hoped this rough tool will give a starting point by which sites of particular concern can be highlighted and approached to make improvements in a timely fashion.

The University Web Strategy has the vision that “We work together to offer a consistently excellent user experience for global and local audiences.” In general, the automated scanning tool should help us improve the quality and reliability of the information we have on line including any information about the protected characteristics specifically. This should enhance equality of opportunity by helping to ensure that individuals have access to the correct information specifically as it might apply to protected characteristics e.g.; crèche facilities, staff network groups, staff disability, student disability service etc.

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

If the quality of our websites is better, offering a better and more inclusive user experience, websites can effectively be used to foster good relations. This monitoring tool should help us improve the accessibility of the web estate for disabled users as well as improving the quality of the information on the website that may be specifically relevant to certain protected characteristics e.g. to information on the LGBT+ staff forum etc. It is hoped this will demonstrate the seriousness with which IS and the University take Equality and Diversity issues.

- If the policy/practice create any barriers for any other groups?
All staff and students of the University have free 24 hour access to IT facilities and staff will be provide with all equipment they need to use and apply the results of the scanning tool so there should be no barrier for anyone on lower incomes.
- How the communication of the policy/practice is made accessible to all groups, if relevant?

The tool will initially be used to better understand issues before establishing standards in areas such as accessibility. Where the results relating to a website are considered serious, for example security vulnerabilities or severe accessibility issues, this will be raised discreetly with website managers. Overall web estate ‘health’ will be reported with anonymised and aggregated basis and use as a marker of where improvement is needed.

Among the formal committees and groups to be engaged with are:

- Web Publishers Community
- Web Developers Group
- CCPAGs
- College IT teams

Communication formats will be a blend of:

- 1-2-1 and group meetings
- Email
- University website & blog

All online communications will be in alignment with the University's accessibility policy which is based on the latest version of Web Content Accessibility Guidelines AA standard. Where group meetings are being held or 1:1's consideration will be given regarding any reasonable adjustments a person may need, accessible locations and times and dates of meetings to account for those with caring responsibilities and those who observe times of religious observance as far as possible.

All communication will be provided in alternative formats free of charge for any reason related to a disability.

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

The Information Services Disability Information Officer will lead on interpreting results, assessing their usefulness, identifying trends and recommending actions, in the area of accessibility. All feedback will be monitored for any positive or negative impacts on any of the nine protected characteristics and the appropriate action taken.

- 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:

It will be made clear to all staff that with particular regard to the accessibility scanning element of this tool that automated accessibility checking is not comparable to human checking and a good or negative result on the automated accessibility scanning cannot confirm the accessibility or inaccessibility of the website as a whole but can only give a starting point.

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.

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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).
 - We will continue to work with the supplier to make improvements to the systems accessibility and to improve the content and quality of the automated accessibility testing results..
 - All feedback on the policy, positive or negative, will be reviewed for any comments related to any of the 9 protected characteristics and will be acted on accordingly.
 - Staff will be made aware of the need to provide documents in alternative formats upon request.
2. When will the policy/practice next be reviewed?

When there are any significant changes to the scanning tool or when we receive any positive or negative feedback related to any of the 9 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)):

Jonathan Trout

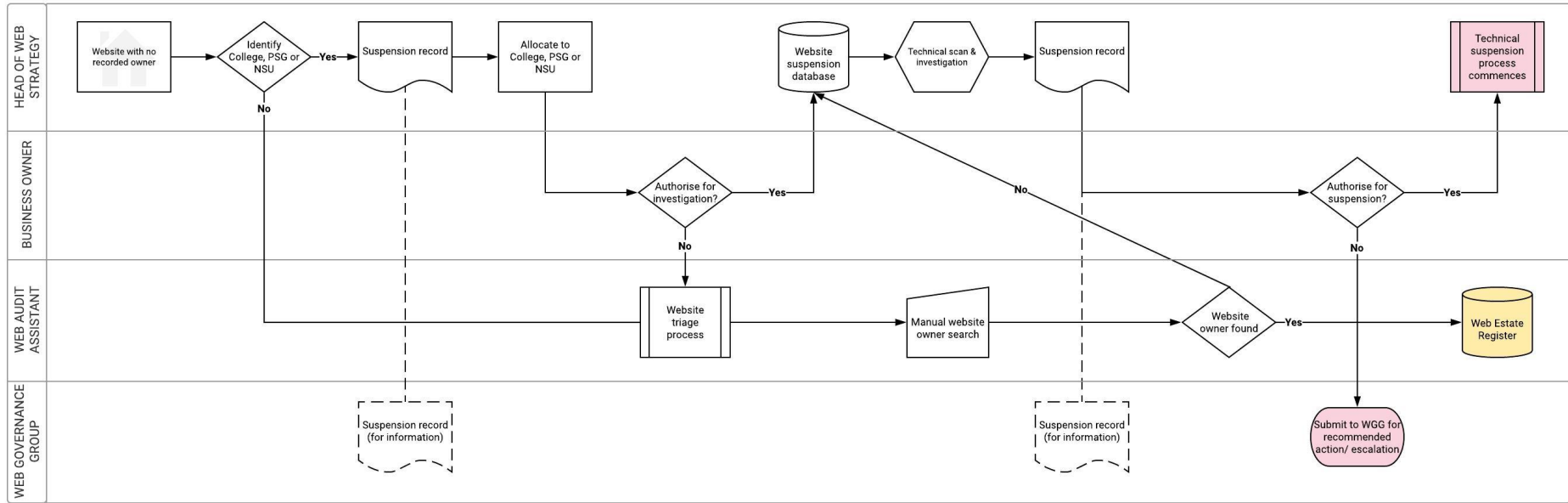
,Head of Web Strategy, Information Services

Accepted by (name): Gavin Mclachlan, Chief Information Officer and Librarian to the University

Date: 03rd July 2019

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

Appendix 1 – Business process for ownerless website suspension



Key:

PSG - Professional Services Group
 NSU - Non-specific Unit