



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 EqlA of the policy or practice. All full EqlAs are published.

A. Policy or Practice (name or brief description): Online submission of Digital Images by Online Distance Learners for use on their University Card
B. Reason for screening (delete as applicable): <ul style="list-style-type: none">• Proposed change to an existing policy/practice
C. Person responsible for the policy area or practice: Name: Barry Croucher Job title: Head of Help Services School/service/unit: IS User Services
D. Screening Analysis 1. Does the policy or practice affect primary or high level functions of the University? No 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)? Yes 3. Is the policy or practice one on which interested parties could reasonably expect the University to have carried out an EqlA? Yes If the answer to any of these questions is 'Yes', an EqlA should be carried out on the proposed/revised policy or practice at an early stage and in any event before it is finalised.
E. Screening outcome Equality Impact Assessment required: Yes Record notes about the screening process or outcome here. <ul style="list-style-type: none">• If EqlA is required, note when/at what stage(s) and by whom EqlA will be carried out.• If EqlA is not required, note plans for review, monitoring or other action (including the communication of any favourable equality impact). Viki Galt, IS Disability Information Officer, identified the need for a Screening analysis on Tuesday 21st May 2013 having been invited by Laura Bell, the TEL005 project manager, to conduct accessibility testing. Responsibility for the Screening analysis was accepted by the Service Owner on Wednesday 5th June. Barry Croucher is Service Owner of University Card Services. Barry Croucher completed the Screening analysis on Friday 7th June. Barry Croucher will carry out the EqlA in July, following his period of annual leave, and to be completed in advance of deployment for use by Online Distance Learners.
F. Sign-off Screening undertaken by (name(s) and job title(s)): Barry Croucher, Head of Help Services Accepted by (name): Barry Croucher, Head of Help Services [This will normally be the person responsible for the policy/practice named in C above. If not, specify job-title/role.] Date: 7th June 2013

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 new practice will facilitate online submission of a digital image by Online Distance Learners (ODLs) for use on their University Identity Card.

Currently, the card application process is entirely paper based for all students.

Paper forms are sent to a student's home address. The student checks their details, adds a photograph to the form and then returns it to the University. Card Services print all the cards in bulk over the summer, and, typically, the students collect their cards at the start of semester.

There are many disadvantages with this approach for ODL students. The current method relies on a mail service and this can be sub-optimal in some countries. It gives a poor impression of the University especially for students who are expected to complete their studies fully online. Students studying off campus cannot collect their cards, which are instead sent by mail. Many ODLs do not bother returning a form and so do not receive a University card. Having possession of a University card can be advantageous to ODLs as a means of evidencing membership of the

University and their student status.

Facilitating online submission of digital images will mean:

- **ODLs will not have to obtain a physical photograph, as they will be able to use a digital image taken on a range of devices with cameras and uploaded onto computer;**
- **the process of submission of digital image will be within the online environment in which they are studying (via a channel in MyEd);**
- **there will be a preview function allowing ODLs to check before submission that the image is likely to be acceptable for use, so reducing delay and need for resubmission of a substitute image;**
- **ODLs will receive a request from Card Services for submission of an image sooner than currently, as the request for digital image will be made by email automatically after the student goes UF (Unconditional Firm), rather than necessarily after the students status is set to ATR, normally 6 weeks before start date, and by post;**
- **ODLs will not have to pay for postage to return a completed card form with photograph attached;**
- **all ODLs who submit an acceptable image will receive a University Identity Card through the post, after their student status is set to ATR;**
- **ODLs will only be able to submit one image as standard practice and once accepted, request for replacement by a substitute image would not be granted; however, in the case of gender reassignment, for example, request would be granted, and the channel in MyEd can be enabled by Card Services staff to allow for a replacement digital image to be submitted and a replacement card sent out.**

The first phase of the TEL005 project - to enable University Card Services to identify ODLs as distinguished from other students by means of a flag in the Card system - went into service on 24th July 2012. The second phase of the TEL005 project – to enable ODL students to submit a digital image via MyEd, and for University Card Services to manage the submitted images – went into the live environment on 10th July 2013 but is not in service. This is because the digital image channel for ODL students has not been released. The intended release date is Tuesday 6th August 2013: this is the start date for the new practice.

As of 26th July there are 284 ODL students who would be contacted by email on 6th August inviting them to submit a digital image. There are actually 302 new ODLs for session 13/14 but 18 of these are in the position of having had a card previously.

The issue of providing a digital image may have particular impact with regards to disability, race, religion/belief and gender reassignment. The other issue with regards to equality is that the change of practice should ensure ODL students without the means to take a digital image are not discriminated against.

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 practice is relevant to all equality groups as it will apply to any ODL student wishing to obtain a University Identity Card. The practice may potentially have greatest impact on the areas of disability, race, religion/belief, and gender reassignment. Being able to complete the process remotely and online will potentially have a positive impact on the protected characteristics of gender reassignment (individuals will be able to update their photograph and details as

they wish to reflect their progressions through the reassignment process), disability (particularly those with a physical impairment as they will be able to submit their photograph remotely and do not need to access an accessible passport photo booth etc but can take a photo with an ordinary digital camera) and race (as those ODL students in countries with less reliable mail services will only be reliant on receiving the card through the post and not sending the application form as well). All those with caring responsibilities who may find it difficult to leave the house to get a photograph taken and then post a completed form to Card Services should see a positive effect. There is a potential for a negative effect on religion and belief and race due to the need for a photograph to be submitted. This will be the same for the new process as with the old paper based process. To mitigate these effects if an ODL student is unable to be identified from their image due to them wearing protective head covers for religious purposes then senior staff trained in Equality and Diversity will be able to make a final decision on whether or not to accept the image and issue a University card. In the event that an ODL had a religious or belief objection to a digital image or photograph being taken they would not have to submit/supply an image/photograph, and a University Identity Card would not be issued.

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 partnership¹

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).

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 recommendations.

This change to practice has arisen in order to provide an improved service to all ODL students (see section 1 above). There were 1782 ODLs in 2012/13. As of January 2013, 44 were registered with University Student Disability Services. The demographic of the 2012/13 ODL cohort shows ODLs are domicile in 111 countries and 48% of ODLs are non UK/Ireland domicile. There is evidence that ODLs have a low take up of the University card: a report run on 16th October 2012 (after the main intake of students) showed that 537 ODLs and Part Time Modular Masters students did not have a University card. This raises concerns that certain equality

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.

groups might find it difficult to obtain a physical photograph, perhaps due to distance from or physical difficulty in using a printing service. The change of practice will make it easier for the user to obtain a University card, and take up is expected to increase greatly.

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.

At present no records are kept of religion/belief for ODLs; this gap is known to Amy Woodgate, the Project Coordinator - Distance Education Initiative (DEI) & MOOCs, and is standard as the characteristic is not surveyed for any student.

An evaluation of ODL users in relation to the new practice will be conducted in Semester 1 2013/14 in order to receive feedback on how well it is serving the needs of ODLs, and reference direct or implied to equality issues will be analysed and addressed where possible.

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?

If the approval of digital images is not implemented with the correct support and procedures there is the potential for discrimination/less favourable treatment. Staff making the approvals will follow guidelines as to the conditions determining whether an image is acceptable or not, especially in cases where due to religious reasons the student wishes their face to be covered or where the individual is in the process of gender reassignment. In rejecting an image a reason has to be given from a select list or by free text entry. The ODL receives an email explaining the reason for rejection, with the invitation to submit a different image. The ODL would be able to challenge the rejection and Card Services managers would review. In addition, a routine sample quality review of rejected images will be undertaken by Card Service managers. Other than the approval process there should be no potential for discrimination as any student unable to use the online system for whatever reason would be able to request a form to be sent to them by email for them to print and attach a physical photograph and return by post to Card Services (similar to the existing paper based system).

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

If the ODL student is unable to be identified from their image due to them wearing protective head covers for religious purposes then senior staff trained in Equality and Diversity will be able to make a final decision on whether or not to accept the image and issue a University card.

In the event that an ODL had a religious or belief objection to a digital image or photograph being taken they would not have to submit/supply an image/photograph, and a University Identity Card would not be issued.

If digital image submission proves to be more difficult than supplying a physical photograph (for example no access to a digital camera), ODLs will be able to request a .pdf form to be sent to them by email for them to print and attach a physical photograph and return by post to Card Services (similar to the existing paper based system).

All communications regarding this process will be available in alternative formats upon request.

6. Does the policy/practice contribute to advancing equality of opportunity²? 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 practice contributes to advancing equality of opportunity as indicated in the preceding statements, summarised below:

- **request for an image for Card use will be made by email, much quicker than a paper request from sent by mail; the return of an image will be electronic and not by post this will have an impact on those for whom travelling to a post box/office is a problem.**
- **a traditional camera will not be required to be used to take a physical photograph, nor will ODLs have to obtain a photographic print; a wide range of devices have a digital camera which can be used to take an image, this will have an impact on those for whom travelling to obtain a suitable photograph is a problem.**
- **the process for submitting an image for University card will be fully online, within the study environment of ODLs and the system has been accessibility tested**
- **ODLs can preview their digital image within the MyEd channel before submitting to self-assess the acceptability of the image for Card Services use;**
- **there are no postal charges incurred by ODLs (unless they opt to send a physical photograph);**
- **a change of card image can be facilitated in certain circumstances, eg gender reassignment;**
- **more ODLs will be issued with a University Identity card, with its attendant benefits to the card holder;**
- **an alternative paper based method of returning a photograph can be offered to ODLs unable to use the digital image submission process;**
- **there is no sanction applied to ODLs who do not submit an image and do not obtain a card.**

7. Is there an opportunity in applying this policy/practice to foster good relations between people in any protected group and those who are not³? Will it help to tackle prejudice and/or promote understanding?

This practice may assist to foster good relations with certain equality groups by increasing the likelihood that ODLs will have a University Identity Card, which they could be required to produce in the event that they are in Edinburgh and attend on campus (for example, attending a graduation ceremony or visiting the Main Library). It will also help students undergoing a gender reassignment process as they will be able to have an ID card that reflects their most current appearance. It will potentially enable some disabled users to obtain a University card with greater ease. This will show to students that the University considers Equality and Diversity in its processes.

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?

There is no expectation of different equality groups having different expectations or requirements other than those already discussed above.

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.

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)?

We have no expectation of a higher or lower uptake by any equality groups.

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

No. All equality groups will have access to the service. We have completed an accessibility evaluation of the online application to make sure it is as accessible as possible to disabled users and reasonable adjustments will be available for anyone unable to complete the online process for any reason e.g. ODLs will be able to request a .pdf form to be sent to them by email for them to print and attach a physical photograph and return by post to Card Services (similar to the existing paper based system).

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?

The new practice should not create any barriers for any other groups as the digital image can be taken and submitted by the individual in their own time and should cost less than having a passport photo taken, printed and then posting it. The new practice will be communicated via the webpages which have been tested for accessibility and via pre-defined standard emails sent initially to the ODL's personal email account used during application to the University course, and then to the ODL's University email account. The University Identity Card is sent by post with a standard covering letter. This letter will be available in alternative formats upon request.

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

The Disability Information Officer for Information Services was consulted about any potential issues that might affect disabled users. The practice will be monitored and reviewed and equality groups consulted when any specific issues arise.

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 other issues other than those mentioned above

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.

Outcome: 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.

Evidence is provided in section G above.

I Action and Monitoring

1. Specify the actions required to implement the findings of this EqIA.
Ensure all staff involved with the implementation of the practice have training on applying the criteria for approval of digital images. Service managers monitor rejections to assess this aspect of a quality service. In addition all staff involved in the process must be made aware of the reasonable adjustments as detailed in section 5.
2. State how the policy or practice will be monitored in relation to its equality impact (or note where this is specified above).
The practice will be monitored on an on-going basis with particular attention being paid to cases where digital images are rejected. An evaluation of the practice by surveying ODL users will be conducted in Semester 1 2013/14. Representatives from particular equality groups will be asked for their feedback if we are aware of any potential issue in that area.
3. When will the policy/practice next be reviewed?
Within 5 months of implementation (ie prior to 31 December 2013).

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)): **Barry Croucher, Head of Help Services**

Accepted by (name): **Barry Croucher, Head of Help Services**

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

Date **26th July 2013**

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