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 EIQAs – 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.

<table>
<thead>
<tr>
<th>A. Policy or Practice (name or brief description):</th>
<th>Exam Papers Online</th>
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<th>B. Reason for screening (delete as applicable):</th>
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<tbody>
<tr>
<td>• Proposed new policy/practice</td>
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<tr>
<td>• <strong>Update 2016:</strong> this update is a review of the existing EqIA version published 2014.</td>
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<tr>
<th>C. Person responsible for the policy area or practice:</th>
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<tbody>
<tr>
<td><strong>Update 2016:</strong></td>
</tr>
<tr>
<td>Name: Elizabeth Stevenson</td>
</tr>
<tr>
<td>Job title: E-Resources Manager</td>
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<tr>
<td>School/service/unit: Library and University Collections</td>
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**Update 2016:** Name: Hannah Mateer

Job title: **Collections Lifecycle Manager**

School/service/unit: **Library and University Collections**

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<tr>
<th>D. Screening Analysis</th>
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<tbody>
<tr>
<td>1. Does the policy or practice affect primary or high level functions of the University? <strong>Yes</strong></td>
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<tr>
<td>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)? <strong>No</strong></td>
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<tr>
<td>3. Is the policy or practice one on which interested parties could reasonably expect the University to have carried out an EqIA? <strong>Yes</strong></td>
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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.

<table>
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<th>E. Screening outcome</th>
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<tbody>
<tr>
<td>Equality Impact Assessment required: <strong>Yes</strong></td>
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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.
- If EqIA is not required, note plans for review, monitoring or other action (including the communication of any favourable equality impact).

**Update 2016:** This is the latest update of the EqIA conducted in 2014

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<th>F. Sign-off</th>
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<tbody>
<tr>
<td>Screening undertaken by (name(s) and job title(s)): Elizabeth Stevenson, E-Resources Manager</td>
</tr>
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Accepted by (name): Elizabeth Stevenson, E-Resources Manager
[This will normally be the person responsible for the policy/practice named in C above. If not, specify job-title/role.]

Update 2016:
Screening undertaken by: Claire Knowles, Library Digital Development Manager
Accepted by: Hannah Mateer, Collections Lifecycle Manager

Date: 10th August 2014
Updated: 8th January 2016

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 particular relevant (which should be the main focus for EqIA)? On what aspects of equality does the policy/practice particularly impact?

The Exam Papers Online website makes the University’s past exam papers available online to students and staff with EASE authentication. The website functionality includes
the ability to browse and search for papers and then see information and download PDFs. This site should be the main source of past exam papers. Alternative formats will be available upon request and this will be made clear on the website.

As this is an online system a key focus of the EqIA will be around the requirements of disabled users and the need for the system to be as accessible as possible and compatible with the main forms of assistive software.

Update 2016:
This site has now been launched. There have been no requests for changes to the site after launch that impact the EqIA. The only changes have been with new data uploaded and text changes. The system has been up and running for 2 years now. We have had no feedback via user testing and the feedback link related to any of the protected characteristics within this time.

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

Exam Papers online will be available to all staff and students at the University and therefore it has the potential to be relevant to all groups. However, the site will be of particular relevance to the protected characteristics of disability (in that the online system will need to be accessible in terms of meeting current guidelines and compatible with assistive technology) and also Race as the system will only be offered in English, although English is the main teaching language of the University so we would not envisage this to have a negative impact.

Update 2016:
This site has now been launched. There have been no requested for changes to the site after launch that impact the EqIA. Some changes have been made to text to remove any ambiguity and due to the removal of the old website, which was maintained after the initial launch to ensure that all exam papers were always available online, an overlap in services was to reduce risk in-case of downtime with the new site.

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

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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.
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.

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 Library Digital Development Team are currently undertaking demonstrations to gather feedback from staff and students to identify best practice in the display and searching of the collections. We will monitor feedback received from users and will run a session with students in the Main Library. The Information Services Disability Information Officer (IS DIO) will complete a detailed accessibility review of portal and will continue to review the accessibility of all new developments.

Update 2016: Demonstrations were undertaken with staff and students. That resulted in some minor changes to the screen layout and terminology before launch and improvements to the search results order. Search results were updated so the most recent papers were returned first.

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. Although the site is only provided in English the portal is only available to internal users (Staff) and as English is the main teaching language of the university we would not envisage this causing any issues.

Update 2016: We have received no feedback to suggest that this system leads to any form of prohibited conduct.

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

If an individual is unable to use the online system they will be able to contact the E-Resources team for the information to be provided for them in an alternative manner upon request. Papers have not been made available routinely in paper copies since 2005.

Update 2016: We have received no requests for any reasonable adjustments but will continue to ensure staff are ready and alert to the need to respond and make such adjustments should the need arise. No paper copies were requested.

6. Does the policy/practice contribute to advancing equality of opportunity? Will it help to:

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2 This question does not apply to the protected characteristic of marriage or civil partnership.
• remove or minimise disadvantage
• meet the needs of different equality groups
• encourage increased participation of particular groups
• take account of disabled people’s impairments?

By making the exam papers available online through an accessible system we hope to ensure that access to this resource is easier for certain disabled users such as those with visual impairments who may require to use screen reader equipment and to those with other commitments such as carers who may find it difficult to find time to physically access the library.

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?

By ensuring that reasonable adjustments are in place and that the online system is as accessible as possible we hope that this will demonstrate the seriousness with which the University takes the issues of Equality and Diversity.

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?

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.

Update 2016: There have been no requests for the papers in different languages or any issues raised regarding the accessibility of the system. There has been no feedback related to any of the 9 protected characteristics.

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 do not envisage any higher or lower uptake by any of the equality groups.

Update 2016: We have no evidence of any higher or lower uptake by any equality group. Since launch there have been over 1,700,000 page views of the exam papers website. With peaks during exam periods.

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

No, although the application is only provided in English but as English is the main teaching language of the University we would not envisage that anyone accessing the service would be prevented from doing so.

Update 2016: We have received no feedback or comments that suggest that any equality group has been excluded or has experienced any difficulties with the system.

11. Does the policy/practice create any barriers for any other groups? For example, because

3 This question does not apply to the protected characteristic of marriage or civil partnership.
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. The University offers free 24-hour access to computers for staff and students so even those users without their own access to the internet should be able to access the site as required.

Update 2016: **We have received no feedback or comments that suggest that the system has created any barriers for any individuals.**

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.

Update 2016: **We will ensure all changes to the system are tested for accessibility and will continue to monitor all feedback regarding any positive or negative impacts on any of the 9 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.

N/A

**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.

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.

For the reasons given above,

Update 2016: **Option 1 for the reasons detailed above.**

**I Action and Monitoring**

1. Specify the actions required to implement the findings of this EqIA.
E-Resources staff will be informed of the requirement to provide individuals unable to access the online version the information in an alternative format and this will be advertised to students.
- Any information relating to Equality and Diversity that arises out of the hands on tester sessions with students will be considered and acted upon where appropriate.
- Update 2016: No issues relating to Equality and Diversity were raised during the tester sessions. We will continue to monitor all feedback for any potential impact and make reasonable adjustments as requested.

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

   All feedback will be monitored to see if any issues regarding equality and diversity are being highlighted and then any appropriate action taken.

   Update 2016: Any feedback continues to be monitored and changes made if necessary.

3. When will the policy/practice next be reviewed?
   Anytime the system goes through a major upgrade and on an annual basis.

   Update 2016: When there is next any major change or upgrade to the system or if we receive any positive or negative feedback related to the 9 protected characteristics.

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)): Elizabeth Stevenson, E-Resources Manager, Library and University Collections

Accepted by (name): Elizabeth Stevenson, E-Resources Manager, Library and University Collections

Update 2016: undertaken by :Claire Knowles, Library Digital Development Manager. Accepted by :Hannah Mateer, Collections Lifecycle Manager

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

Date: 12.11.14
Retain a copy of this form for your own records and send a copy to equalitydiversity@ed.ac.uk