



## Equality Impact Assessment

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](http://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.

### Equality impact assessment for the replacement freedom of information (FOI) request planning tool, eCase from Fivium.

**A. Policy/Practice (name or brief description):** **Development of a replacement information request handling process, including the implementation of a replacement freedom of information (FOI) request case management system. It will not change the way people submit their FOI requests to the University**

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

- ~~• Proposed new policy/practice~~
- **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: **Tracey Slaven**

Job title: **Deputy Secretary, Strategic Planning**

School/service/unit: **Governance and Strategic Planning**

**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 **NO**
- 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 partnership<sup>1</sup>

**This change introduces a new internal online system for staff to manage the information requests that come in, it will not affect the way individuals submit requests to the University. As a result all staff using the new system may be impacted and therefore there is the potential for protected characteristics to be affected but we feel the characteristics most likely to be affected are disability and race.**

**Disability may be impacted as the system will need to be accessible for disabled users in line with the Web Content Accessibility Guidelines 2.1 AA standard including compatibility with assistive technology. The system has been tested for compliance with these guidelines and the supplier has been asked to make a number of improvements to improve the accessibility of the system. We will continue to push for accessibility improvements and where we are unable to resolve any issues, reasonable adjustments will be put in place to ensure no individual is placed at a disadvantage.**

**There may be a potential impact on race as the application is only available in English. However, as English is the standard language of the University we believe this will not put any individual at a disadvantage.**

**All information queries that come in will be dealt with in accordance with internal and external data protection requirements and no confidential information about any individuals protected characteristics would be disclosed.**

**The new system will allow easier monitoring of requests and may make it easier to spot requests related to Equality and Diversity issues and this may help us make changes and alterations to the information provided by the University. The new system will also make it easier for people to work from home and this may have a positive impact on those with caring/parental responsibilities, disabled users and those who observe times of religious observance.**

**The new system allows all information relevant to a request to be held in one place that is accessible to those with relevant access permissions from any location using a web browser. This has a potential positive impact for staff needing to work from alternative locations, for example individuals with protected characteristics relating to religion/belief, disability, pregnancy and maternity.**

Add notes against the following applicable statements:

- On any available information about the needs of relevant equality groups: **An Accessibility Evaluation was carried out by the Information Services, Disability Information Officer on 11 July 2019 highlighted a number of concerns regarding the application interface. The resultant report has been shared with the application provider and will if possible be acted upon during the**

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<sup>1</sup> 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.

configuration of our instance. It has been requested that the recommendations be proposed for inclusion in the development roadmap used to continuously improve the case management application. The system will be tested again prior to going live. All staff in the Records Management Section (RMS) in the procurement process have had the opportunity to test drive the system and feed their comments into the process. These are the staff primarily affected by this change

- 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. As a result of the Accessibility Evaluation and focus that the application provider put on equal accessibility we feel that we are in an appropriate position to proceed with the implementation of the case management application.**
- 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 for the reasons detailed above and below. Where a disabled member of staff was unable to use the online system and we were unable to rectify the issue, appropriate reasonable adjustments would be put in place such as the provision of assistive technology or providing the person with assistance to input data. When setting up our correspondence templates we will implement best practice guidelines to ensure our letters are accessible to different groups.**
- If the policy/practice contributes to advancing equality of opportunity<sup>2</sup>:  
**It is envisaged that the implementation of the case management application will improve the overall process for receiving, recording and responding to freedom of information requests (FOI), subject access requests (SAR) and other data protection (GDPR) requests as well as related internal reporting. As a result the Records Management Section should benefit from more efficient work processes and increased productivity. The system is more accessible than the previous system and more consistent so should make it easier to use by disabled staff. Having a system that allows us to track requests more efficiently should help us be able to highlight areas where we need to improve the way information is provided and in particular in areas related to Equality and Diversity e.g. it will be clearer to see if there were a lot of freedom on information requests about numbers of disabled students and we would be able to act by highlighting this information on the website to a greater extent.**
- If there is an opportunity in applying this policy/practice to foster good relations:  
**All information requests provide an opportunity for the University to demonstrate transparency and accountability and thereby increase trust. We hope that by showing we have considered all positive and negative impacts related to the nine protected characteristics that we have demonstrated the Universities commitment to Equality and Diversity.**
- If the policy/practice create any barriers for any other groups?  
**All staff have free 24 hour access to the IT facilities needed to do their jobs so there should be no negative impact on those with lower incomes. Correspondence with applicants is normally carried out in the method preferred by the applicant. Requests are primarily received by email and, to a lesser**

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<sup>2</sup> This question does not apply to the protected characteristic of marriage or civil partnership

extent, post. Processes will be formalised to respond to requests received using social media (e.g. Twitter, Facebook, Instagram, etc.), voicemail and in certain cases verbally.

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

**All information about the change will be made available in alternative formats upon request free of charge for disabled users as required. A Communication plan will be created to ensure the appropriate training is provided and guidance on the use of the system by both Records Management and Practitioners is available. Training will be provided for staff on the new system and this will take place on a variety of days and times to allow for those with caring responsibilities or those who observe times of religious observance.**

**Reasonable adjustments will be put in place for disabled users to make sure that the training meets individual accessibility requirements and will be held in accessible locations as far as possible.**

- 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 was given access to an evaluation version of the case management application and carried out an accessibility evaluation of the application. The report was generally positive and in conclusion stated the system had reasonable accessibility. The report and recommendations have been forwarded to the application provider to assist with the configuration of our version of the application and to feed into the development roadmap for the application. We will continue to monitor all feedback for any positive or negative comments related to any of the nine protected characteristics and act 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 stated 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 and below.**

~~**Option 2:** Adjust the policy or practice – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations.~~

~~**Option 3:** Continue the policy or practice despite the potential for adverse impact, and which can be mitigated/or justified~~

~~**Option 4:** Stop the policy or practice as there are adverse effects cannot be prevented/mitigated/or justified.~~

#### 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).

During the implementation and configuration of the case management application efforts will be made to implement the recommendations contained in the accessibility evaluation report where possible. We will feed back to the supplier any areas where accessibility could be improved which are out with our control.

Staff will be provided with instructions for the use of the new application and their feedback will be monitored with regards the usability of the application and request management process. All feedback will be monitored for any positive or negative feedback related to any of the nine protected characteristics

We will remind managers and staff of the need to make reasonable adjustments for disabled users as applicable and to provide information in alternative formats free of charge for a reason related to a disability.

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

Information request management practices and procedures are under continual review.

We will review and update the EqIA when there is any significant change to the service or when we receive any positive or negative feedback related to any of the nine 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)): **Anne Grzybowski, Information Compliance Manager, Records Management Section**

Accepted by (name): **Tracey Slaven, Deputy Secretary, Strategic Planning, Governance and Strategic Planning**

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

Date: **23.09.19**

Retain a copy of this form for your own records and send a copy to [equalitydiversity@ed.ac.uk](mailto:equalitydiversity@ed.ac.uk)