



## 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](http://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](mailto: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.

A. Policy or Practice (name or brief description): <b>Improving Main Library Access for visitors</b>
B. Reason for screening (delete as applicable): <ul style="list-style-type: none"><li>• <b>Proposed change to an existing policy/practice</b></li></ul> <p><b>Update March 2016 – Review of EqIA</b> <b>Update March 2017 – Review of EqIA</b></p>
C. Person responsible for the policy area or practice:  Name: <b>Barry Croucher</b>  Job title: <b>Head of Help Services</b>  School/service/unit: <b>IS user Services</b>  <b>Update March 2017 – Review of EqIA signed off by Barry Croucher, Head of Help Services, IS User Services</b> <b>Update March 2017 – Review of EqIA signed off by Barry Croucher, Head of Help Services, IS User Services</b>
D. Screening Analysis  1. Does the policy or practice affect primary or high level functions of the University? <b>Yes</b> 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)? <b>Yes</b> 3. Is the policy or practice one on which interested parties could reasonably expect the University to have carried out an EqIA? <b>Yes</b>  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.
E. Screening outcome  Equality Impact Assessment required: <b>Yes</b>  Record notes about the screening process or outcome here. <ul style="list-style-type: none"><li>• If EqIA is required, note when/at what stage(s) and by whom EqIA will be carried out.</li><li>• If EqIA is not required, note plans for review, monitoring or other action (including the communication of any favourable equality impact).</li></ul> <p><b>Barry Croucher conducted a Screening analysis on Friday 22nd March 2013 when preparing a working paper, outlining proposed changes to Main Library access for visitors, for the University Library Committee meeting on 10th April. Barry Croucher will carry out the EqIA to be completed by 12th August, to coincide with the policy change.</b> <b>EqIA carried out annually since 2013.</b></p>
F. Sign-off  Screening undertaken by (name(s) and job title(s)): <b>Barry Croucher, Head of Help Services</b>

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: **8<sup>th</sup> May 2013**

**Update March 2016 – this is a review of the impact assessment and was carried out by Karen Bonthron, Help Services Section Manager, Information Services and Paul Gorman, Deputy Head of Help Services, Information Services and accepted by Barry Croucher, Head of Help Services, Information Services.**

**Update March 2017 – this is a review of the impact assessment and was carried out by Karen Bonthron, Help Services Section Manager, Information Services and accepted by Barry Croucher, Head of Help Services, Information Services.**

If EqIA is not being carried out, delete the remainder of this form and send the completed form to [equalitydiversity@ed.ac.uk](mailto: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?

This policy is intended to facilitate access to the Main University Library for day users who do not have a student/staff card or a visitor card. At present there are concerns that the lack of a day pass system prevent some genuine users from gaining access to the library due to the stringent entrance requirements. It is the intention of the policy to provide a method by which University staff on Reception of the Main Library can issue a day visitor pass to allow users to access the library on one occasion if they have valid photographic ID. The issue of photographic ID may be of particular impact to the protected characteristics of religion/belief, gender reassignment and race potentially. The other area of the policy which is of particular importance with regard to equality is the issue of senior managers discretion either whether a person does not have photographic ID or where they do but appear to be under the influence of drugs or alcohol which we need to ensure will not lead to discriminatory decisions.

- 1) Update March 2016: The day system pass is now operational. Reception staff explain that one visit access can be granted using photo ID. Staff manually record on a spreadsheet those who have entered in this manner, and it will flag up if a visitor is trying to enter for a second time using this system. Access will be refused on a second occasion.

The spreadsheet can be used to record if users are turned away, and the reason for it. We have discovered in practice that if staff are under pressure then all refusals may not be recorded. We intend to tackle this to ensure that all refusals are properly recorded and staff understand the reasons behind why this recording is important.

- 2) Update March 2017: The day system pass is now operational. Reception staff explain that one visit access can be granted using photo ID. Staff manually record on a spreadsheet those who have entered in this manner, and it will flag up if a visitor is trying to enter for a second time using this system. Access will be refused on a second occasion.

The spreadsheet can be used to record if users are turned away, and the reason for it. Reception staff understand the reasons behind why this recording is important. We encourage the recording of those refused entry despite the pressures on the Reception team. One day visitor pass procedure has been recorded as being used 11063 times since Summer of 2013.

Number of refusals; 241 in 13-14, 226 in 14-15 and 95 so far in 15-16. These figures include the summer preceding the academic year.

The main reasons for refusals are; second visit, no photo ID, asking to just use toilet.

In 2017, for period 31/3/16-1/4/17, there were 247 refusals, 97 of which were due to exam restrictions. The next most common reasons were 2nd day pass and no photo ID. 2/4/17

There have been no complaints about this procedure. There is no record of manager discretion being used.

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 policy is relevant to all equality groups as will apply to any member of the public wishing to access the library without a membership card. The policy may potentially impact on the areas of race, religion and belief, disability and gender reassignment to the greatest extent because of the issue of photographic ID, (see question 4)**

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<sup>1</sup>

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 policy has arisen over complaints that individuals with a genuine case to visit the library were being denied access. This in turn raised concerns that certain equality groups might find gaining access more difficult for instance those living in hostels of certain groups of the travelling community who might not be able to produce utility bills. In addition anecdotal evidence from University staff confirmed suspicions that visitors to the library from abroad are unlikely to carry this information but would be likely to have photographic ID available to them such as a passport. Photographic ID is required to ensure security measures are met to protect library collections and other users.**

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.

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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.

**At present no records are kept on those who are refused entry but as part of this policy we intend to instigate this in order that any potential impact on specific equality groups might be more easily spotted.**

**Update March 2016 – We have realised that in practice some refusals and the reasons why are not being recorded. In order to address this we plan to liaise with staff so they ensure the importance of recording refusals and the reason why.**

**Update March 2017 – We have realised that in practice some refusals and the reasons why are not being recorded. Staff have been reminded of the importance of recording refusals and the reason why.**

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 policy is not implemented with the correct support and procedures there is the potential for discrimination/less favourable treatment. Staff and in particular those making discretionary decisions will receive full equality and diversity training and be made aware of potential likely scenarios and how best to address these for example, to ensure conditions such as Parkinson's Tourette's syndrome etc where there are physical manifestations of a disability are not confused with individuals under the influence of drink or drugs. The issue of photographic ID has the potential to be discriminatory but again the intention to have a senior staff member make a final decision is intended to alleviate any potential negative impact. For example those users who are in the process of gender reassignment may not have photographic ID that is of a good current likeness and/or will include the individual's previous name. In a similar manner users of a particular religion and belief may require to cover the heads/faces and therefore not be recognisable by photo ID.**

**Update March 2016 – we do not believe that this practice has led to any form of prohibited conduct.**

**Update March 2017 – we do not believe that this practice has led to any form of prohibited conduct.**

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

**In terms of reasonable adjustments there are several in place:**

- **If a user is unable to sign the document due to disability another individual can sign on their behalf.**
- **Is the user is unable to be identified from their photo due to them wearing protective head covers for religious purposes or because they are undergoing a process of gender reassignment then managers senior staff trained in Equality and Diversity will be able to make a final decision.**
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**Update March 2016- There have been no requests for adjustments.**

**Update March 2017- There have been no requests for adjustments.**

6. Does the policy/practice contribute to advancing equality of opportunity<sup>2</sup>? Will it help to:
- remove or minimise disadvantage
  - meet the needs of different equality groups
  - encourage increased participation of particular groups

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

- take account of disabled people's impairments?

**The policy will ensure more individuals will be able to access the library on a day pass basis, therefore those who have no permanent residency and are therefore unable to provide utility bills will still be able to access the library on one occasion on a day pass basis. This may be of particular benefit and increase participation of various sections of the traveller community or for those in hostel accommodation. In addition visitors from abroad will now be able to gain access for a day on one occasion with photographic ID.**

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<sup>3</sup>? Will it help to tackle prejudice and/or promote understanding?

**This policy may assist to foster good relations with certain equality groups by reducing the stringent requirements required for entry to the library by introduction of a day pass which will remove some potential areas where the current policy could disadvantage certain equality groups.**

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.**

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.**

**Update March 2016 – we have no evidence of higher or lower uptake by any of the equality groups**

**Update March 2017 – we have no evidence of higher or lower uptake by any of the 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.**

**Update March 2016 – there is no evidence that any equality group has been excluded from accessing this service.**

**Update March 2017 – there is no evidence that any equality group has been excluded from accessing this service.**

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?

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<sup>3</sup> This question does not apply to the protected characteristic of marriage or civil partnership.

There is the potential for asking for photographic ID may exclude some groups – we have tried to make the range of acceptable photographic ID accepted as wide as possible : - driver licence, passport, bus pass/rail pass, institutional ID or national ID card. In addition in the event that a user may not have photographic ID we have allowed the backup option of senior manager’s discretion to permit access. The new policy is applied by University staff on Reception to deal with circumstances of unannounced, unexpected arrivals and is not advertised on the University web pages.

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 policy 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: Adjust the policy or practice – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations. This may involve removing or changing the aspect of the policy/practice that creates any negative or unwanted impact. It may also involve introducing additional measures to reduce or mitigate any potential negative impact.**

**We will take the steps to adjust the policy as specified in section G and below.**

**Update March 2016 – We believe the policy does not create any negative impact on any of the nine protected characteristics and that it does not lead to any form of prohibited conduct. We recognise the need to ensure that staff are aware of the need to record access and refusals by this service and the important reasons behind doing so in order to continue to monitor the service for any positive or negative impact on any of the 9 protected characteristics**

**Update March 2017 – We believe the policy does not create any negative impact on any of the nine protected characteristics and that it does not lead to any form of prohibited conduct. We recognise the need to ensure that staff are aware of the need to record access and refusals by this service and the important reasons behind doing so in order to continue to monitor the service for any positive or negative impact on any of the 9 protected characteristics. To date we have received no feedback or complaints**



about this process.

## **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 policy have extensive equality and diversity training and are made aware of potential issues relating to certain equality groups that may arise.**
  - **Set up a recording method to note cases where entry has been refused and the reason why.**

**Update March 2016 – we will continue to ensure staff involved in this policy receive appropriate training**

**As noted above we will revise the recording procedures to ensure all cases of refusal are recorded and the reasons why and that staff that understand the importance of recording use and refusal of this service.**

**Update March 2017 – we will continue to ensure staff involved in this policy receive appropriate training**

**As noted above we will revise the recording procedures to ensure all cases of refusal are recorded and the reasons why and that staff that understand the importance of recording use and refusal of this service.**

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

**-The policy will be monitored on an on-going basis with particular attention being paid to cases where admission was refused. Representatives from particular equality groups will be asked for their feedback if we are aware of any potential issue in that area.**

**Update March 2016 – We will continue to monitor all feedback and cases of refusals to ensure we are aware of any positive or negative feedback on any of the 9 protected characteristics**

**Update March 2017 – We will continue to monitor all feedback and cases of refusals to ensure we are aware of any positive or negative feedback on any of the 9 protected characteristics**

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

**12 months time**

**Update March 2016 – the policy will next be reviewed in February 2017**

**Update March 2017 – the policy will next be reviewed when there are any changes in the policy or if there is any positive or negative feedback related to any of 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)): **Barry Croucher, Head of Help Services**

**Update March 2017 – this is a review of the impact assessment and was carried out by Karen Bonthron, Help Services Section Manager, Information 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.]

**Update March 2017 – Barry Croucher, Head of Help Services.**

Date **9th August 2013**

**Update March 2017 (2/4/17)**

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