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 EqIAs of the policy or practice. All full EqIAs are published.

| A. Policy or Practice (name or brief description): |
| Collections Management Policy 2015-2020 |

| B. Reason for screening (delete as applicable): |
| • Other (please state): Proposed change to existing policy |

| C. Person responsible for the policy area or practice: |
| Name: Jeremy Upton |
| Job title: Director of Library & University Collections |
| School/service/unit: Library & University Collections (Information Services) |

| D. Screening Analysis |
| 1. Does the policy or practice affect primary or high level functions of the University? Yes |
| 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 EqIA? Yes |

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: Yes |

| F. Sign-off |
| Screening undertaken by: Jacky MacBeath, Head of Museums |
| Accepted by (name): Jeremy Upton, Director of Library & University Collections |
| Date: 24th August 2015 |

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 Policy governs how rare and unique collections, and information about rare and unique collections, are managed, preserved, stored, made accessible and promoted.

An existing policy on University Collections Policies Document 2010-2015 is out of date and does not comply with the new Arts Council England (ACE) Museums Accreditation Scheme 2011 standard for collections management policies.

A new set of policies has been drafted for all University Collections which complies with the new Museum Accreditation Scheme standard and new Archives Accreditation Scheme Standard. The new set of policies takes a service-wide approach and is contained within the Collections Management Policy (CMP) 2015 – 2020.

The previous documentation has been reviewed in accordance with best practice, as stipulated by the Museum Accreditation Scheme. Previous versions related only to museum and object collections. The review has allowed the drafting of new policies to govern all University Collections including museum collections, archives, rare books and manuscripts. This properly reflects the converged nature of the
management of University Collections and the development of a service-wide approach to curatorial training, collections access, stewardship, engagement and service delivery.

The purpose of the CMP is to bring together in one place the policies of The University of Edinburgh which relate to the management of the collections that are owned or cared for by the University of Edinburgh and that are currently held at the locations listed below and also in store at the Library Annexe. Collections are displayed at the same locations, the Talbot Rice Gallery and in the Main Library Exhibition Gallery.

The Policy statement (Section 1 – Collections Management Policy) serves as an introduction to the following discrete policy areas:
Policy 1 – Collections Information Policy
Policy 2 – Collections Care and Conservation Policy
Policy 3 – Collections Access and Loans Policy
Policy 4 – Collections Development Policy
Appendices A to G – Collections Development Policy Statements
Appendix H - Guidelines for deciding on requests for the repatriation of items from the University Collections

The proposal to change the policy has been supported by University Collections Advisory Committee and the proposal will be implemented in 2015-2016 academic session after approval from University Court.

The provision of information online and the access to physical collections have the greatest implication on equality groups. And in particular race and disability.

It is believed that the policy will be positive for disabled users as the CMP 2010-2015 is designed to be more accessible, streamlined and available than the policy it replaces, the University Collections Policies 2015-2010. For the first time various policies are brought together under one overarching policy, and the policy applies to all rare and unique collection-types. The revised policy will be published on the Centre for Research Collections website, and will be available in alternative formats upon request.

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

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.
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).

The protected characteristics that may experience greatest impact by implementation of this policy are:

Disability – in terms of both format, online presence and physical access. There is the intent contained in the policy that collections information (as opposed to collections access information which is already provided online) will be gradually more available online. This has an implication for some disabled users. The online systems will be tested for its compatibility with assistive technology and with World Content Accessibility Guidelines (WCAG version 2) The Main Library has been recently refurbished and undergoes a yearly accessibility audit. All floors are fully accessible and disabled fire evacuation systems are in place. Accessible toilets are available on all floors. Auxiliary aids such as induction loops have been installed at all help/reception desks. We aim to make all our library and collection sites as accessible as possible but where the collections are held out with the Main Library and where a user finds the Main Library more accessible items can be moved there for them to view.

In addition, some disabled users may require the provision of print material in electronic format and printed copies of electronic format and we are in the process of making information about rare and unique collections available in electronic formats as resources allow.

Race: The majority of information about rare and unique collections is in English, as English is the main teaching language of the University, and so we do not envisage this should cause any disadvantage.

Pregnancy and maternity and sex: there may be the possibility that the provision of electronic content offers a benefit of great access to information off-campus and off-site, improving flexibility during pregnancy and maternity leave and for those with caring responsibilities (which research shows tends to primarily fall on woman). Therefore this policy which includes the intent to increase digitisation of collections may have a positive impact on these characteristics.

Religion and Belief – there is no requirement in this policy for staff to work on Saturdays or days of religious significance.

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.

Evidence about the needs of the relevant equality groups is gathered from experience of museum staff in existing museums and collections services, and from the involvement of Disability Information Officer, Information Services.

The CMP has been created in accordance with best practice and in order to meet the requirements of both the Museums Accreditation Scheme and the Archives Accreditation Scheme. Work has been led
by Jacky MacBeath, Head of Museums and Rachel Hosker, Archives Manager, with input from curatorial and support staff based in the Centre for Research Collections and Museums. Additional information has been supplied by academic members of the Committee of Curators of University Collections (CCUC), a University Collections Advisory Committee sub-committee, and by academic members of University Collections Advisory Committee. The CMP has been reviewed externally in draft form by Museums Galleries Scotland (the National Development Body for the museum sector in Scotland).

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 we do not feel anything is missing however we will continue to monitor feedback from all users for any comments related to equality issues both positive and negative. Should the scenario arise where an individual from an equality group requires further support in the use of University Collections, L&UC will endeavour to meet those needs quickly and seamlessly.

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 envisage that any users should experience any form of prohibited conduct as a result of this policy. The majority of information about rare and unique collections is in English, as English is the main teaching language of the University, and so we do not envisage this should cause any disadvantage. There may be the possibility that the provision of electronic content offers a benefit of great access to information off-campus and off-site, improving flexibility during pregnancy and maternity leave and for those with caring responsibilities (which research shows tends to primarily fall on woman). Therefore this policy which includes the intent to increase digitisation of collections may have a positive impact on these characteristics.

Religion and Belief – there is no requirement in this policy for staff to work on Saturdays or days of religious significance.

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

The policy and communication about the policy will be available in alternative formats upon request. Staff will be in place as needed. Reasonable adjustments will be made for disabled staff. Physical collections will be moved to the Main Library or other accessible location for a user requiring accessible consultation space.

6. Does the policy/practice contribute to advancing equality of opportunity\(^2\)? Will it help to:
   - remove or minimise disadvantage

No.
   - meet the needs of different equality groups

Yes - by making the collections more accessible to disabled users by increased digitisation this equality groups. Reasonable adjustments will be put in place for disabled users and staff as required.

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\(^2\) This question does not apply to the protected characteristic of marriage or civil partnership
The majority of the materials are in English but as we English is the main teaching language of the University we do not foresee that this should result in any disadvantage.

- encourage increased participation of particular groups
Yes – many disabled users find electronic materials easier to access and this is reflected in our decision to make collections information available online where possible, and free of charge. Where online publication is not possible, physical access is promoted through the Centre for Research Collections.

- take account of disabled people’s impairments?
Yes – online services will be tested to ensure compatibility with assistive technology and WCAG version 2 guidelines. Physical premises are made as accessible as possible and the Main Library has been made as accessible as possible as described above. Reasonable adjustments will be put in place for disabled users and staff as required.

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?

In the main the policy applies to physical collections, however in showing that we are aiming to publish collections information online, we are taking account of the needs of disabled users and others users with protected characteristics when implementing this policy and making decisions about information format and methods of dissemination.

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?

Yes – as described above disabled users will need the online systems and physical premises to be accessible. There is no requirement for staff to work on religious holidays.

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 that there will be any higher or lower uptake by any equality group.

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

No equality groups are excluded.

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?

No user should experience a barrier due to the implementation of this policy revision.

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

Internally the Disability Advisor for Information Services has reviewed the Project Equality Impact Assessment. Any revisions to the policy will follow this screening exercise. Any comments or queries

³ This question does not apply to the protected characteristic of marriage or civil partnership.
received about the policy will be checked for any possible equality implications and the policy adjusted accordingly. This monitoring will continue when this Equality Impact Assessment is reviewed and feedback will be analysed for any issues relating to Equality and Diversity.

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.

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.

I. Action and Monitoring

1. Specify the actions required to implement the findings of this EqIA.

Ensure staff are aware of the need to make reasonable adjustments and to provide information in alternative formats.

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

Referring to section 12 which states the equality impact assessment for the CMP will be reviewed annually.

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

The EqIA will be reviewed and published during the next CMP review, expected 2019 or when there is any feedback related to any of the 9 protected characteristics or if there is any significant change to the policy before this.

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

J. Sign-off

EqIA undertaken by: Jacky MacBeath, Head of Museums

Accepted by: Jeremy Upton, Director of Library & University Collections

Signed: [Signature]

Date: 24th August 2015
Retain a copy of this form for your own records and send a copy to equalitydiversity@ed.ac.uk