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

<table>
<thead>
<tr>
<th>A. Policy or Practice (name or brief description):</th>
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<tbody>
<tr>
<td>Library Management Platform (LMP) replacement project</td>
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<th>B. Reason for screening (delete as applicable):</th>
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<tr>
<td>• Proposed change to an existing policy/practice</td>
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<th>C. Person responsible for the policy area or practice:</th>
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<tbody>
<tr>
<td>Name: Laura Shanahan Update 2017: Kirsty Lingstadt</td>
</tr>
<tr>
<td>Job title: Head of Collections Development and Access Update 2017: Head of Digital Library</td>
</tr>
<tr>
<td>School/service/unit: Division of Library and University Collections, Information Services</td>
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<th>D. Screening Analysis</th>
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<tr>
<td>1. Does the policy or practice affect primary or high level functions of the University? Yes</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)? Yes</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? Yes</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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<tr>
<td>Equality Impact Assessment required: Yes</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.

An initial EqIA was conducted prior to the procurement, and this is the updated EqIA following the recommendation to the Project Board, and signing of contract with the successful tenderer. We are now at implementation stage.

**Update Feb 2016: the system was implemented in July 2015. This update was undertaken by Laura Shanahan, Head of Collections Development and Access.**

Update July 2017: a new Primo ('DiscoverEd') User Interface was launched in July 2017. This update was undertaken by Laura Shanahan, Head of Collections Development and Access.

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<th>F. Sign-off</th>
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<tr>
<td>Screening undertaken by (name(s) and job title(s)):</td>
</tr>
<tr>
<td>Laura Shanahan, Head of Collections Development and Access</td>
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</tbody>
</table>
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 Library Management Platform (LMP) should be considered the ‘backbone’ to all Library collection services which are accessible to all students and staff of the University. It is an online system, and acts as the catalogue of the Library’s collections through the system’s ‘Discovery Platform’. As such, it has the potential to impact all of the nine protected characteristics, through the implementation of a new system. This
may be particularly relevant to disabled users, due to the change in interface for library staff users and library users.

The current system has been used by the University for 15 years, and is no longer suitable for providing the range of collections services and management needed for a twenty-first century library. In particular, the current system does not support e-resource management and requires the use of multiple add-on systems to deliver the range of resources (both print and electronic) to users – this means providing multiple access points to resources from the library webpage, leading to confusion for users.

It has been deemed necessary to follow a full procurement process for a replacement solution, opening our business up to alternative suppliers in this process. A full formal governance process has been created for this project, including a project board with academic representatives from each College and the EUSA Vice-President of Academic Affairs. The board meet every six weeks to ensure best practice project management.

There are further user groups: a 'LMP Discovery User Group' which is engaging directly with students across a range of disciplines and levels of study and academics representing the three Colleges. Additionally, there is an internal library user group. Over 40 staff (library and academic) and students were involved in the development of the requirements and demonstration scenarios for the procurement, with significant input from the Information Services Disability Information Officer (DIO).

The successful tenderer scored highest on accessibility during the procurement process.

**Update 2016** – The new system has now been up and running since July 2015 and the LMP Discovery User Group continues to engage with stakeholders as does the internal library user group. We have received no negative or positive feedback related to any of the protected characteristics and have not received any requests for reasonable adjustments. All feedback on the system is being recorded on a Bristol Online Survey tool. It is too early to be able to analyse yet whether the new system has led to increased usage.

**Update 2017** – A new User Interface has been launched by the software provider, Ex Libris, and has been adopted by the University. It currently sits in parallel with the existing interface, which will be deactivated at some (currently undecided) point in the future.

The new interface is broadly considered to be different in relation to look and feel (and so should be considered a standard upgrade), with some adjustments to low-level functionality within the interface, including:

1. Changes in the font and colour palette used.
2. A different mechanism for sign-in.
4. Access to all item-level details within a single page, rather than in tabs.
5. A new page numbering approach, allowing the user to jump back to the first page and look forward and back more quickly.
6. The removal of the ‘date slider’ tool for reviewing items within a publication.
date range.

vii. More obvious and regular opportunities to undertake export / email / permalink / citation of records.

viii. Changes to the application of Facets, where facets are refined using an ‘exclude’ function, rather than ‘exclude and include’.

NB: User migrating to the new interface are not able to automatically transfer ‘Saved Searches’ from the existing interface.

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

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).

As stated above, the LMP will be available to all staff and students at the University, and will be used heavily by Library staff in their day-to-day working, and therefore it has the potential to be relevant to all protected groups.

It will be particularly relevant to some disabled users who may require the system to be accessible and/or may rely on assistive technology to access web resources. Also, the version of the LMP presented to our users will only be available in the English language (with the exception of descriptive metadata for non-English language resources listed within the catalogue). However, English is the main teaching language of the University, so we do not envisage that this will cause any disadvantage. We will endeavour to support any users who do not speak English in their use of our collections through the IS Helpline and on campus staff support.

Update 2016 – We have not encountered any instances where the fact the system is only provided in English has caused any issues or disadvantage. We will continue to endeavour to support any users who do not speak English if this situation arises.

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.
Update 2017 – The Disability Information Officer has conducted a review of the new user interface against the current Web Content Accessibility Guidelines Version 2 AA standard including compatibility with assistive technology this has raised some issues in particular to do with colour contrasts which we are in the process of actively resolving.

We have not encountered any instances where the fact the system is only provided in English has caused any issues or disadvantage. We will continue to endeavour to support any users who do not speak English if this situation arises.

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.

The Information Services Disability Information Officer (IS DIO) has been involved in writing requirements for the procurement phase of the project, and was involved in evaluating supplier’s written responses to these requirements, and testing the systems to ensure the systems were tested for compliance with current accessibility guidelines (Web Content Accessibility Guidelines (WCAG) version 2) and compatible with assistive technology. We currently have 3,079 registered disabled students (9% of the student population), although we recognise that not all disabled users declare a disability.

During the procurement evaluation stage, Library staff and academics and students had the opportunity to input into marking suppliers based on accessibility and usability.

We have considered and will continue to consider all feedback relating to the project and the implementation of a new platform, in particular those related to equality and diversity issues.

Update 2017: There continues to be student and academic engagement with the LMP through the established Discovery User Group. In planning for the implementation of the new UI, this group were engaged to provide feedback. We also continue to run a Bristol Online Survey for feedback on the system and review the responses on a weekly basis. So far feedback from these avenues have illustrated no demonstrable impact on any of the nine protected groups.

The Disability Information Officer has conducted a review of the new user interface against the current Web Content Accessibility Guidelines Version 2 AA standard including compatibility with assistive technology this has raised some issues in particular to do with colour contrasts which we are in the process of actively resolving. The number of registered disabled students has now risen to 10.20% (3,644) and we also have a significant number of disabled staff although deceleration rates amongst staff are low but it is hoped that since the appointment of a new Staff Disability Officer disclosure rates will increase.

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 have sufficient evidence to proceed and will continue to monitor feedback and user comments to ensure all issues (either positive or negative) relating to equality and diversity are noted and acted on appropriately. The Project team have been in contact with both the Student Disability Service and the International Office. A further session introducing the new Discovery tool to the Student Disability Service is planned for early June, prior to implementation.

As stated above, input relating to equality and diversity requirements of a replacement platform have been incorporated into the requirements documentation for the procurement process. During the evaluation of supplier’s responses, opportunities for feedback were taken in the User Groups on equality and diversity related matters.

Update 2016: We have been recording feedback on the system using a Bristol Online Survey directly from the webpage, and so far, none of the comments received have been relating to matters of equality and diversity. A further session to introduce the tool to the Student Disability Service was offered in June prior to implementation.

Update July 2017: As the new User Interface is being launched outwith the main semester period, we have gaps in evidence of use in relation to the quantity of users engaging with the system in this period. We will continue to monitor feedback in the peak periods of activity of semester 1 and 2 (2017/18.)

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?

It may be anticipated that the implementation of the new system will simplify access to resources and library staff user’s interactions with the areas of the system needed to perform their roles. It would be considered extremely unlikely that the change will has led to any forms of prohibited conduct, and any such risk was minimised/depleted in the procurement evaluation phase. The system will continue to be monitored to ensure that no discrimination occurs.

Update 2016: Positive feedback relating to the new system has regularly been in relation to simplifying users access to resources and library staff user’s interactions with the areas of the system needed to perform their roles. There has been no evidence that the change has led to any forms of prohibited conduct.

Update 2017: There has been no evidence that the system has led to any form of prohibited conduct and we continue to receive positive feedback from most users that the system is effective and simple to use – the exception to this has been from the cohort of retired academics and this issues is discussed further below.

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

For any users who, due to a reason related to their disability, cannot use the online system they will be able to seek assistance via University staff on campus, or through phoning or emailing the Information Service Helpline. All communication about the new system will be available in alternative formats upon request.
Update 2016: There were no requests for reasonable adjustments and no requests for information in alternative formats.

Update 2017: with the new User Interface we have noted some issues with colour contrasts as a result of the accessibility testing which we are acting upon and aim to resolve as soon as possible. In the meantime reasonable adjustments will be made to ensure no user is disadvantaged. We have received no requests for reasonable adjustments since the last review of the EqIA.

6. Does the policy/practice contribute to advancing equality of opportunity? 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?

As part of the procurement requirements, suppliers have been asked to respond to a series of questions which indicate their solution’s adherence to current accessibility guidance in line with WCAG version 2. This should ensure the system takes account of disabled people’s impairments and we would hope it will increase participation by disabled users of the library catalogue.

There are a few anticipated improvements as a result of the implementation of the new system.

- Simplification of the access points to collections;
- Improvements in search functionality;
- Reasonable fulfilment of interface presentation in relation to WCAG version 2 requirements;
- Increased usage of the system and increased usage of the collections, across all groups of users, as a result of a simplified solution.

Update 2016: Feedback has suggested that the new system has led to simplification and the system selected scored highest on the accessibility questions in the procurement. A full audit report will be completed and published in Summer 2016.

Update 2017 – what was the result of the audit report 2016?
The update was tested by the Information Services Staff Disability Officer as detailed above to check the system’s accessibility for disabled users.

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? Will it help to tackle prejudice and/or promote understanding?

The process of undertaking the Equality Impact Assessment has been highlighted to the project board as part of best practice for project governance. It has reiterated the importance of ensuring careful consideration of the needs of protected groups specifically, along with all other users of the system. It is hoped that this will promote understanding of equality and diversity and the seriousness with which the University takes these issues.

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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.
Because of the range of stake-holders involved in the project (including students, academic staff, the student union and library and IT staff), it may be expected that individuals within the project have some relationship to protected characteristics, and identify that the project is taking such characteristics into due consideration.

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?

Some disabled users may require the system to be accessible and/or compatible with assistive technology, and a requirement to this effect has been included in the procurement documentation for suppliers to respond to.

Although the system is only in English (with the exception of the descriptive metadata relating to resources published in non-English languages), there should not be an expectation from users that they system will be available in any other language, as the teaching language of the University is English. We will endeavour to support any users who do not speak English in their use of our collections through the IS Helpline and on campus staff support.

**Update 2016:** We have had no issues reported regarding the system's accessibility or any requests for assistance due to the system only being provided in English, nor has there been any negative feedback about either of these issues.

**Update 2017:** As stated above, with the new User Interface we have noted some issues with colour contrasts as a result of the accessibility testing which we are acting upon and aim to resolve as soon as possible. In the meantime reasonable adjustments will be made to ensure no user is disadvantaged.

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)?

No, we do not expect any lower or higher uptake by any equality group.

**Update 2016:** to the best of our knowledge there has been no higher or lower update by any one equality Group.

**Update 2017:** As above we have no evidence to suggest any higher or lower update by any one equality group, although we have received some feedback in particular from retired academic staff (who by their nature tend to form an older cohort) that they find the new system hard to use. In response to this we offer assistance to anyone who is struggling to assist them as much as possible.

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

As the new system will be presented in the English language, non-English speakers may have more difficulty in accessing the system. However, primary users of this system will be enrolled on courses at a university, where English is the teaching language, this should not create any disadvantage. In addition, we will endeavour to support any users who do not speak English in their use of our collections through the IS Helpline and on campus staff support.

**Update 2016:** As recorded above we will continue to support any user who has difficulty accessing the system. Reasonable adjustments for disabled users will be
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 University provides 24 hour access to computing facilities for all students so there should not be any disadvantage to users, on the basis of income, caused by IT-based systems. Non-enrolled/non-staff users can access the system for free from within the University’s library sites.

Update 2016: We have had no reports of the new system causing any barriers to any other groups. In fact, feedback has shown that users are reporting that the system is much easier to use.

Update 2017: The majority (13.8%) of feedback relating to the system that is negative has come from the group self-identifying as Retired Academic Staff. We believe this is as a result of this group having been trained to use our previous ‘library catalogue’, which broadly restricted results to physical items, and is no longer fit for purpose. In most instances, those providing feedback from this group have not provided contact details in order for Library staff to follow up and provide further assistance. Where contact details have been provided Library staff have made contact and attempted to assist the individuals as far as possible.

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 was involved in evaluation of the platforms on offer during the procurement phase, and continues to be involved in the project through implementation to business-as-usual, reviewing the accessibility of the platform for disabled users.

In addition, all feedback from stake-holder groups relating to the platform will be monitored and acted upon to ensure there is no negative impact on any protected characteristics, and to note any positive impact.

Update 2016: We are proactively continuing to monitor feedback and acting on it as appropriate.

Update 2017: We are proactively continuing to monitor feedback for any positive or negative feedback relating to any of the 9 protected characteristics and acting on it as appropriate. The Information Services Disability Information Officer conducted accessibility testing of the new system as detailed above.

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.

The information we provide to users and schools on reasonable adjustments will be available in a variety of formats upon request.

Update 2016: We have to date received no requests for information in alternative formats but will continue to offer this on request.

Update 2017: As the launch of the new User Interface is being treated as an ongoing enhancement, like any other dynamic system, promotional material regarding the
launch were low-level (primarily utilising the DiscoverEd interface itself, and via communication routes within and from the Library). We will of course provide all information about the change in alternative formats free of charge on request for disabled users.

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.

State the reasons for this conclusion and the evidence used, if not already included in section G.

The steps relating to the procurement phase (regarding involvement of the IS DIO and relevant stake-holders) and the current plan for implementation, including the risk log and governance structure, suggest that the practice will be robust and there is no evidence of potential unlawful discrimination. It is clear that the project will use all reasonable opportunities to advance equality and foster good relations, subject to continuous monitoring and review.

Update 2016 – Option 1 for the reasons stated above.
Update 2017 - Option 1 for the reasons stated above.

I  Action and Monitoring

1. Specify the actions required to implement the findings of this EqIA.
   - Notify the Project Board of the completion of the EqIA.
   - Continue to monitor feedback from stake-holders in relation to impact on any of the nine protected characteristics.
   - Ensure all communication documentation includes a statement informing users that such communication is available in alternative formats.
   - Alert staff to possible reasonable adjustments.

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

As specified in G1, G3, G12, and I1 above, the project team will ensure all feedback relating to the equality impact of the project will be recorded and duly responded to.

There was monitoring of equality impact through the procurement evaluation phase, and this will continue during implementation.
The IS DIO will be engaged throughout the project, working on behalf of disabled users, and the various academic and student groups involved in the project will be encouraged to feedback proactively.

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

The draft EqIA was assessed following the outcome of the procurement phase, resulting in this final version published February 2015.

This EqIA will be reviewed in February 2016.

Update 2016: We will continue to monitor all feedback and act accordingly and the EqIA will next be reviewed and updated when there are any changes to the system or when we receive any positive or negative feedback related to any of the protected characteristics.

Update 2017: We will continue to monitor all feedback and act accordingly and the EqIA will next be reviewed and updated when there are any changes to the system or when we receive any positive or negative feedback related to any of the 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

J. Sign-off

EqIA undertaken by (name(s) and job title(s)): Laura Shanahan, Head of Collections Development and Access

Accepted by (name): Laura Shanahan, Head of Collections Development and Access
[This will normally be the person responsible for the policy/practice named in C above. If not, specify job-title/role.]

Date: 11.02.15
Updated: 06.01.16 by Laura Shanahan
Updated 12.02.17 by Laura Shanahan

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