



# THE UNIVERSITY of EDINBURGH

## 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.

<p>A. Policy or Practice (name or brief description):</p> <p><b>At present, desktop users of MyED have a large number of content channels available to them, and mobile users only a small number of high-priority channels.</b></p> <p><b>This development will allow users to access all MyED content channels on all devices, by applying a single “responsive” web theme to MyEd.</b></p>
<p>B. Reason for screening (delete as applicable):</p> <ul style="list-style-type: none"><li>• <b>Proposed change to an existing policy/practice</b></li></ul>
<p>C. Person responsible for the policy area or practice:</p> <p>Name: <b>Marissa Warner-Wu</b></p> <p>Job title: <b>Web Interfaces Team (WIT) Manager</b></p> <p>School/service/unit: <b>Information Services, Learning Teaching and Web Services Division (LTW)</b></p>
<p>D. Screening Analysis</p> <ol style="list-style-type: none"><li>1. Does the policy or practice affect primary or high level functions of the University? <b>Yes</b></li><li>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></li><li>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></li></ol> <p>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.</p>
<p>E. Screening outcome</p> <p>Equality Impact Assessment required: <b>Yes</b></p> <p>Record notes about the screening process or outcome here.</p> <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>EQIA will be carried out by Marissa Warner-Wu (SOM), Martin Morrey (SO) and Karen Stirling who is Project Manager of the project. The EqIA will be updated as the project develops.</b></p>

F. Sign-off

Screening undertaken by (name(s) and job title(s)):

**Marissa Warner-Wu, Web Interfaces Team (WIT) Manager**

**Karen Stirling, Project Manager, IS Applications**

Accepted by (name):

**Martin Morrey, Head of Web, Graphics and Interaction, IS Applications LTW**

Date: **12/4/2017**

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?

**The new interface will impact on all users and therefore has the potential to affect all nine protected characteristics. However, given the nature of this**

project we would expect the potential greatest impact to be on the protected characteristics of Disability and Race. The new “responsive” user interface for MyED has been developed and tested for accessibility including its compatibility with assistive technology. This EqIA should be read alongside the EqIA for the University Website

[http://www.docs.csq.ed.ac.uk/EqualityDiversity/EIA/University\\_Centrally\\_Managed\\_Public\\_Facing\\_Website\\_at www\(IS\).pdf](http://www.docs.csq.ed.ac.uk/EqualityDiversity/EIA/University_Centrally_Managed_Public_Facing_Website_at www(IS).pdf) and the new interface will need to meet the University’s Website Accessibility policy. Consideration has also been given to the potential positive benefits that increased flexibility of where MyEd channels can be accessed from may create, this may assist care givers who statistically are more likely to be female and so may have positive effect on the protected characteristic of sex. It will also give disabled users greater flexibility in where they access channels from. The system will only be available in English and so has the potential to impact on race but as this is the main teaching language of the University we do not envisage any disadvantage.

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<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).

**All MyEd channels will be available to all MyED users across all device categories – so upwards of 35,000 potential users and therefore potentially all protected characteristics may be affected. The protected characteristics which are particularly relevant to this procurement are disability as the channels must be as accessible as possible for disabled users and race as the system will only be provided in English as this is the main teaching language of the University.**

**Please note that the content within channels and MyED is not being changed, and nor is alternative content being presented – the interface just enables to all content to be viewed on mobiles and tablets. The change to a “responsive” theme results in some stylistic and presentational changes. This does mean that it may be easier for users to view content on the move so may assist**

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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.

**caregivers or parents with young children and so may have positive effect on the protected characteristics of sex, pregnancy and maternity and disability.**

3. What evidence is available about the needs of relevant equality groups? E.g. information/feedback from equality groups or other stakeholders, involvement or research with equality groups or individuals, equality monitoring data, service monitoring data, information for other similar policies/practices, staff surveys, research reports, demographic information, audit, inspection or management reports and recommendations. Where are the gaps in evidence? If there is insufficient information to properly assess the policy, how will this be addressed? If information cannot be gathered now, consider building monitoring into the plans for implementation/review of the policy/practice. Note: the resources put into collecting evidence should be proportionate to the relevance of the policy/practice to equality.

**The Disability Information Officer within IS has performed hands on testing of the interfaces to check their accessibility to disabled users. All issues reported will be dealt with by the project wherever possible; all feedback will be monitored and acted on as appropriate. Current University statistics show that over 10% of the student population at the University consider themselves disabled (3644 students in academic year 2016/17 – the statistics for 2017/18 will not be available until July). We have consulted with the Student Disability Service about this change. There were in 2015/2016 there were 2.9% of staff who had declared a disability which we recognises this is exceedingly low and we would expect the real number to be much higher. At this stage we feel we have sufficient evidence to proceed.**

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 don't envisage that this change should result in any form of prohibited conduct. The project has made every effort to ensure this system is as accessible as possible and has made reasonable adjustments to ensure discrimination does not occur, including ensuring the system:**

- Responds to touch, pinch and zoom on mobile devices
- Uses high contrast ratios
- Uses standard web technologies

**Users can personalise the look of the system on their individual devices, thus ensuring it is as accessible as possible given their individual needs**

**The system is available only in English but as this is the main teaching language of the University we do not envisage that this will cause any disadvantage to users.**

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

**All channels are available on desktop and mobile. All communications on the new interface will be available in alternative formats upon request. If a disabled user were unable to use the interface we would make all adjustments possible to improve the system, failing which we would provide assistance to the user by an alternative method in completing the task they needed too.**

6. Does the policy/practice contribute to advancing equality of opportunity<sup>2</sup>? Will it help to:

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

- remove or minimise disadvantage
- meet the needs of different equality groups
- encourage increased participation of particular groups
- take account of disabled people's impairments?

**The system will take account of the needs of disabled users as accessibility is part of the development build criteria and forms part of the peer testing and user acceptance testing. The potential positive impact on other protected characteristics such as pregnancy and maternity and sex allowing users to access all channels on the move on tablets and mobiles may also encourage more users to use MyED. The application is only in English but as English is the main teaching language of the University we do not imagine that this should cause any disadvantage.**

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?

**The development of an accessible interface and clear information on the accessibility of the system will hopefully illustrate to all the seriousness with which Edinburgh University considers Equality and Diversity issues and especially in this case the protected characteristic of disability.**

8. Is there evidence (or an expectation) that people from different equality groups have different needs or experiences in relation to the policy/practice? If so, what are they?

**A proportion of disabled users will require the interface to be accessible (in terms of current WCAG version 2 guidelines) and to be compatible with accessibility features provided by smart phone/tablet devices.**

**As the main teaching language of the University is English the system will only be available in English so there should be no expectation that the system will be offered in different languages.**

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, no evidence we expect equal uptake from all equality groups.**

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

**No – no equality group is excluded.**

**The services are only provided in English as this is the main teaching language of the University so we do not envisage any disadvantage. The interface has been tested to ensure it is as accessible to disabled users as possible to ensure disabled users can access the channels on their mobiles or tablets. All users will still be able to access the channels via the desktop in addition so no one should be 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?

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

**No such barrier is created, although the system makes the channels available to mobile and tablet users, all the same services are still provided on the desktop, and the University provides free open 24 access to PCs for all staff and students.**

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 will ensure that the developed interface is as accessible to disabled users as possible and all feedback from users will be monitored for any positive or negative impacts on any of the 9 protected characteristics. In addition, the Student Disability Service has been asked to comment on this proposal.**

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.**

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

**The use of mobiles is already standard practise in the University and indeed, future developments in technology and teaching approaches anticipate increasing use of mobile technology. Consequently, this MyED development is part of a wider approach to extend the benefits of mobile access to systems to all staff and all students. We believe the system will not have any negative impact on any of the 9 protected characteristics and may have a positive impact by allowing users greater flexibility in when they can access all the channels from MyEd, for example:**

- greater range of content available to those already using MyEd on their mobile devices
- reduced need to get access to a desktop computer or carry a laptop

**Where necessary reasonable adjustments have been put in place to try to ensure no disadvantage will occur.**

~~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. 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.~~

~~State the steps to be taken to adjust the policy or where these are specified in section G.~~

~~Option 3: Continue the policy or practice – this means adopting/continuing with the policy or practice despite the potential for adverse impact.~~

~~Set out the rationale for this decision, including how the decision is compatible with our legal obligations, or indicate where this is specified in section G. Where there is discrimination, but it is considered not to be unlawful – the objective justification must be recorded.~~

~~Option 4: Stop the policy or practice – if there would otherwise be unlawful discrimination or adverse effects that are not justified and cannot be prevented/mitigated.~~

~~State the reason for this decision, if not already clear from section G.~~

## I Action and Monitoring

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

**Monitor user feedback for any positive or negative impacts on the 9 protected characteristics. Ensure that all communication about the new interface is accessible and available in alternative formats upon request. Ensure staff are aware of any potential reasonable adjustments such as offering the service in an alternative method.**

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 is monitored as part of the overall review of mobile use by senior management and all feedback will be monitored to identify any potential positive or negative impacts on any of the 9 protected characteristics**

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

**The EqIA will be updated when we make changes to the user interface or when we receive 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)): **Karen Stirling, Project Manager, IS Applications**

Accepted by (name): **Martin Morrey, MyEd Service Owner, IS LTW**

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

Date: **14<sup>th</sup> April 2017**

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