



## Equality Impact Assessment Template

Before carrying out EqIA, you should familiarise yourself with the University's EqIA Policy Statement and Guidance and Checklist Notes, and undertake our online training on Equality and Diversity and EqIA. These, along with further information and resources, are available at [www.ed.ac.uk/schools-departments/equality-diversity/impact-assessment](http://www.ed.ac.uk/schools-departments/equality-diversity/impact-assessment)

EqIA covers policies, provisions, criteria, functions, practices and activities, including decisions and the delivery of services, but will be referred to as 'policy/practice' hereinafter.

**A. Policy/Practice (name or brief description):**

**Ownerless website suspension process**

An audit was conducted by Information Services Group (ISG) in late 2017 to understand the size and operational health of websites owned and/ or operated by the University (the 'Web Estate') which revealed a high number of 'ownerless' websites - those for which an accountable person is not recorded.

The known University's Web Estate consists of 1,723 websites, with more than one million web pages indexed by the search engine Google. The EdWeb-based University Website ([www.ed.ac.uk](http://www.ed.ac.uk)) counts as a single website for this purpose. This information forms the basis of the Web Estate Register.

There is a significant issue with ownerless websites - 718 University websites do not have a centrally recorded business owner and 332 do not have an allocated business unit.

These websites pose a risk for the University in the sense that these may not meet compliance with privacy and data legislation (such as the General Data Protection Regulation); equalities legislation; and the potential exploitation of security vulnerabilities. This process will lead to the suspension of websites without a recorded business owner.

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

- Proposed new policy/practice – **YES**  
There is currently no process in place to manage websites without a recorded business owner.
- Proposed change to an existing policy/practice
- Undertaking a review of an existing policy/practice
- Other (please state):

**C. Person responsible for the policy area or practice:**

Name: Colan Mehaffey

Job title: Head of Web Strategy & Technologies

School/service/unit: Learning, Teaching & Web, Information Services

**D.** An Impact Assessment should be carried out if any of the following apply to the policy/practice, if it:

- affects primary or high level functions of the University – YES  
University websites are a vital touchpoint for students, staff and external stakeholders and, as such, should be in line with the University's accessibility policy - <https://www.ed.ac.uk/about/website/accessibility>
- is relevant to the promotion of equality (in terms of the Public Sector Equality Duty 'needs' as set out in the Policy and Guidance)? YES
- It is one which interested parties could reasonably expect the University to have carried out an EqIA? YES

**E.** Equality Groups

To which equality groups is the policy/practice relevant and why? (add notes against the following applicable equality group/s)

- Age
- Disability
- race (including ethnicity and nationality)
- religion or belief
- sex
- sexual orientation
- gender reassignment
- pregnancy and maternity
- marriage or civil partnership<sup>1</sup>

The process has a potential impact against all users of web services and therefore against all protected characteristics. However, we feel this policy will result in positive effects on the 9 protected characteristics rather than negative.

Where websites do not have a recorded business owner, they will be suspended to mitigate risk for the University. Ownerless websites place the University at risk and work is ongoing with Schools, Colleges and Professional Services Groups to reduce the number of websites without a recorded business owner.

It is proposed that University websites which do not have a business owner identified by the end of December 2018 should be suspended in early 2019. If a business owner for a suspended website is identified, the website will be reactivated where appropriate. The business process for the suspension of websites will be submitted for approval by Web Governance Group (WGG) and Information Technology Committee (ITC) in September 2018 **(see Appendix 1)**.

It is critical that websites are not suspended where any of the 9 protected characteristics carry a dependency and this will be considered during the analysis stage. For example, if a website content is specifically related to any of the nine protected characteristics or focussed on Equality and Diversity in general, it will be assessed separately by the Information Services Disability Information Officer.

Accountability for ownerless websites is allocated to an owner for each College and Professional Services Group. In the case that the website falls under the ownership of a Non-

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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.

specific Unit (NSU), such as EUSA, the Head of Web Strategy & Technology will liaise directly with the business unit.

The owner will be empowered to approve the suspension of ownerless websites, based on information supplied by Head of Web Strategy & Technologies. Proposed owners for each College and Professional Services Group have been agreed and are detailed in the diagram below.

A process and technical solution for archiving websites and the creation of an institutional record will be released in 2019.

Add notes against the following applicable statements:

- On any available information about the needs of relevant equality groups:

All website users and therefore all 9 protected characteristics have the potential to be impacted, although we believe this impact will be positive.

All users from all protected characteristics have the potential to experience a positive impact from this policy as by ensuring the website is up to date and reviewed should mean the information on the website is accurate. Therefore if a user were looking for information on for example how to contact the Staff Disability Officer or on crèche facilities etc this should all be up to date. In addition, If a website were found to include any content that was discriminatory, offensive or against the University Dignity and Respect Policy we would know who to contact to remove this content and take disciplinary action as appropriate.

We have consulted with the Information Services Disability Information Officer about this change and there may be additional benefits for disabled users. Disabled users may experience a positive benefit as it will be quicker and easier to provide alternative formats of webpages on request as we will know the page owner to contact. In addition, having an owner of a page should make it simpler to address websites where accessibility issues have been identified and/or where the page fails to meet the University Web Accessibility Policy.

The website is in English but as English is the main teaching language of the University and it is possible to use certain browser plug ins to convert the web pages to different languages we do not believe this will lead to any disadvantage. This issue and general website accessibility issues are discussed in more depth in the IS University Centrally Managed Public Facing Website EqIA which should be read in tandem with this EqIA and can be found at:

[http://www.docs.csg.ed.ac.uk/EqualityDiversity/EIA/IS-University\\_Centrally\\_Managed\\_Public\\_Facing\\_Website.pdf](http://www.docs.csg.ed.ac.uk/EqualityDiversity/EIA/IS-University_Centrally_Managed_Public_Facing_Website.pdf)

- Any gaps in evidence/insufficient information to properly assess the policy, and how this be will be addressed:

At this stage we feel we have sufficient evidence to proceed.

- If application of this policy/practice leads to discrimination (direct or indirect), harassment, victimisation, less favourable treatment for particular equality groups:

We do not believe that this policy will result in any form of prohibited conduct as no protected characteristics should experience any negative impact as the policy will only

result in information on the website being more up to date and arcuate with the potential positive effects associated with this as discussed in this EqIA.

- If the policy/practice contributes to advancing equality of opportunity<sup>2</sup>

The process to do this will improve the overall quality of the web estate and experience for users. It is part of a wider programme works to improve user experience for all groups. This should have the knock on effect of improving the information provided to protected characteristics by ensuring this information is up to date. This may have the positive effect of for example saving individuals with protected characteristics time but ensuring they get the correct information i.e how to contact the Staff Disability Officer. Having an owner for each page will also mean that it is easier to contact websites where there are accessibility issues and they are not meeting the University Web Accessibility Policy. This should make it faster to get these issues resolved. The ability to know who owns a page will give us instant access to know who to contact if a request for a webpage in an alternative format is received so we can respond quickly and efficiently to these requests. In addition, if any webpage was found to have discriminatory content which would breach University Policy e.g. the Respect and Dignity Policy then we would know who to contact immediately to have this material removed and addressed.

- If there is an opportunity in applying this policy/practice to foster good relations: Having up to date information about services (particularly those pertaining to specific protected characteristics e.g. staff/student Disability Service should foster good relations. In addition, by having a named owner of the site, IS staff will know who to contact for alternative formats helping us to provide these to users in a more timely fashion. It will also enable us to have a contact point when we feel there are accessibility concerns regarding a webpage which should help us to address these concerns and resolve them faster. It is hoped that these improvements demonstrate the commitment IS has to Equality and Diversity and thereby help to foster good relations.

- If the policy/practice create any barriers for any other groups?

All staff and students have free access to 24-hour facilities so we do not envisage this should create any disadvantage for those for instance on low incomes who might not have their own IT facilities at home. Websites are an important engagement points for local communities and under-represented social groups, so it is important that they meet an appropriate standard and we hope that by removing unowned websites that the standard of the web estate is maintained.

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

The communication approach is to take taking a top-down/ bottom-up approach to ensure maximum penetration. The University Executive have been asked to support the communication throughout their business areas to ensure maximum penetration with all groups. Equally, all-staff communications and engagement with communities of practice are planned.

Among the formal committees and groups to be engaged with to find owners are:

- Web Publishers Community
- Web Developers Group
- Web Governance Group

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

- University Executive teams
- CCPAGs – need to put this out in full
- College IT teams

Communication formats will be a blend of:

- 1-2-1 and group meetings
- Email
- University website & blog

All online communications will be in alignment with the University's Web Accessibility Policy, which is based on the current version of the Web Content Accessibility Guidelines AA standard. Communications will be made available free of charge in alternative formats upon request for reasons related to a disability.

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

We will monitor all feedback for any positive or negative comments related to any of the 9 protected characteristics and act accordingly.

- Any potential or actual impact of applying the policy or practice, with regard to the need to eliminate discrimination, advance equality and promote good relations:

Nothing other than that discussed above.

#### F. Equality Impact Assessment Outcome

Select one of the four options below to indicate how the development/review of the policy/practice will be progressed and state the rationale for the decision

**Option 1: No change required – the assessment is that the policy/practice is/will be robust.**

For the reasons stated above

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#### G. Action and Monitoring

1. Specify the actions required for implementing findings of this EqIA and how the policy or practice will be monitored in relation to its equality impact (or note where this is specified above).

- During engagement if unowned websites are discovered which advance equality and diversity they will be reported to the Disability Information Officer before suspension.
- Staff will be made aware of the need to provide information about this policy in alternative formats free of charge for reasons related to a disability
- All feedback on the policy, positive or negative, will be reviewed for any comments related to any of the nine protected characteristics and will be acted on accordingly.

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

When we next make a substantial change to the policy or when we receive any positive or negative feedback related to any of the 9 protected characteristics.

**H. Publication of EqlA**

Can this EqlA be published in full, now? Yes

If No – please specify when it may be published or indicate restrictions that apply:

**I. Sign-off**

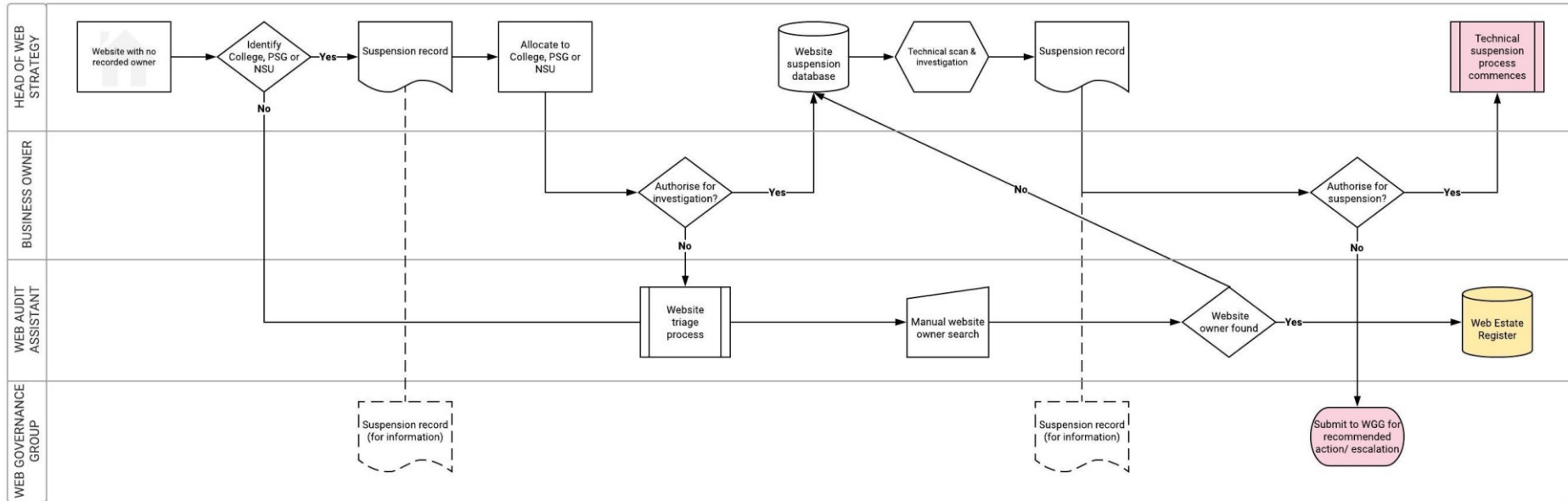
EqlA undertaken by (name(s) and job title(s)): Colan Mehaffey, Head of Web Strategy and Technologies, Information Services

Accepted by (name): Gavin Mclachlan, Chief Information Officer and Librarian to the University

Date: 10.09.18

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

## Appendix 1 – Business process for ownerless website suspension



**Key:**

PSG - Professional Services Group  
 NSU - Non-specific Unit