



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.

<p>A. Policy or Practice (name or brief description):</p> <p>Practice – replacement of hardware public response system (PRS) with a virtual system utilising Wi-Fi, the Internet and students’ own web enabled devices.</p>
<p>B. Reason for screening (delete as applicable):</p> <ul style="list-style-type: none">• Proposed change to an existing policy/practice <p>Update February 2016: Review of EqIA</p>
<p>C. Person responsible for the policy area or practice:</p> <p>Name: Mark Wetton</p> <p>Job title: Head of Educational Design and Engagement</p> <p>School/service/unit: IS Learning, Teaching and Web Services Division</p>
<p>D. Screening Analysis</p> <ol style="list-style-type: none">1. Does the policy or practice affect primary or high level functions of the University? Yes2. 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)? Yes3. Is the policy or practice one on which interested parties could reasonably expect the University to have carried out an EqIA? Yes <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: Yes</p> <p>Record notes about the screening process or outcome here.</p> <p>The EqIA will be carried out in advance of receiving tenders for the new PRS and will be updated once the details of the qualifying solutions are known. The EqIA will be carried out by Wesley Kerr.</p> <p>Update February 2016: This is a review of the EqIA a year after the initial assessment was made.</p>
<p>F. Sign-off</p> <p>Screening undertaken by (name(s) and job title(s)): Wesley Kerr Educational Design and Engagement Senior Advisor</p> <p>Accepted by (name): Mark Wetton</p> <p>Date: 22 August 2014</p>

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?

Public response systems allow teaching staff to ask questions of the students during a lecture and allow those students to reply anonymously. The current PRS is entirely hardware based. Students require access to a small provided handset to allow them to take part in the activity. There are approximately 4,000 handsets in use at the University. Distribution across Colleges is not even and each College has its own means of operating the service – i.e in Science & Engineering students are usually issued with a handset for a semester whereas in Medicine & Veterinary Medicine handsets are kept in specific locations and handed out just for sessions that require them.

The new system that has been procured is software based and uses Wi-Fi, the Internet and students own web-enabled devices to run a PRS session – in addition the system can optionally, on a course by course basis, to use SMS thus expanding the range of devices to include non-smart mobile phones. The main

concern is the impact of this change in practice on disabled users as a protected characteristic. So the system needs to be accessible to disabled users and compatible with some forms of assistive technology as appropriate.

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 partnership¹

The switch from a hardware system will mean that the new PRS will potentially be available to more staff, and therefore students, than currently. Responding to a question will require the use of a web-enabled device – smart phone, tablet, laptop, eReader, etc. – (or non-smart mobile phone if SMS is switched on as an option) and so students who require accessibility features or assistive technology to use such devices should expect any system to be compatible with such features or technology.

We do not envisage any impact on any of the other protected characteristics and have consulted with the International Office, Student Disability Service and Chaplaincy to find out if they were aware of any cultural, religious or other issues that we may have missed – they did not come back to us with any issues. The impact on users in protected characteristics will be monitored in feedback from users in case any issues are reported. e.g. Although the application's interface is in English, the main teaching language of the University, use of the application would not be restricted to sessions delivered in English as questions could be delivered in any language.

Update February 2016: There have been no issues raised to date concerning the use of the system in relation to any of the nine protected characteristics. Up to December 2015, Top Hat had been accessed by 370 staff, 4870 students and over 245,000 submissions had been made to the system. It is being used by students from every School in the University.

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).

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.

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.

Assistive technology for a range of disabilities has been considered equally e.g. visual impairment, physical impairment, etc. In addition other accessibility criteria regarding the look of the system have been considered e.g. change in font – type, colour, size, etc. The Information Services Disability Officer will be involved in the assessment of all systems for accessibility that are considered for tender. There is a minimum level of compliance required before a system can be considered for procurement. In addition once a system has been deployed we will monitor feedback from users for any issues relating to any of the protected characteristics.

Student surveys at different levels across the University (i.e. all students, within MVM, small pop vox sessions with individual cohorts) suggest that smart phone ownership is about 90% and that of the 10% not owning a smart phone virtually all own an alternative web-enabled device. The use of SMS, if required/desired, would cover almost 100% of the student population.

Update February 2016: There have been no issues raised to date concerning the use of the system in relation to any of the nine protected characteristics. In addition no issues have been raised concerning having a suitable device to access the system.

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 Information Services Disability Officer will be involved in the assessment of the new system. We have consulted with the International Office, Student Disability Service and Chaplaincy who did not raise any cultural, religious or other issues that we may have missed. The evaluation of the solutions included small groups of students from across the University who had the opportunity to make any comments.

Update February 2016: The Information Services Disability Information Officer will assess any changes to the technology with regards to accessibility. We plan to run consultations with staff users using the system on their experiences and the feedback from their students and will look for any positive or negative impacts on any of the 9 protected characteristics.

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 the system will lead to discrimination, harassment or victimisation of any users. The system will be tested for compatibility with assistive technology and other accessibility criteria and guides for users will be produced advising them of any special actions they will need to take to use the system. The

system is only available in English but as English is the Main teaching language of the University and courses are offered in English we do not believe this will cause a disadvantage.

Update February 2016: We have no evidence of the system resulting in any form of prohibited conduct.

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

Educational Design and Engagement will publish all required information on their web site for the system – alternative formats will be provided on request. If any problems arise in the use of the system, steps will be taken to resolve them or put in place any reasonable adjustment. Discussions have taken place with Colleges about the provision of discretionary funds for students, on the lowest incomes, not owning a suitable device but it is hoped that this will not be necessary.

Update February 2016: No requests for reasonable adjustments have been received. We will continue to offer to and provide reasonable adjustments as required.

6. Does the policy/practice contribute to advancing equality of opportunity²? 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?

The current handsets are not designed with accessibility for those with a physical or visual impairment in mind. It is hoped that the new system being web based will offer students more opportunity to take part in a session through the use of familiar equipment, accessibility features and assistive technologies. The user will be able to use their own device which will already be customised to their requirements and configured in a way that is most helpful to them rather than having to use a general device. It is hoped that this will allow for the greater participation of users and particularly disabled users.

Update February 2016: There has been no negative or positive feedback from users related to any of the 9 protected characteristics.

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?

The introduction of an accessible system will hopefully allow users who may have been excluded from the previous system feel included in voting sessions. It may also help to highlight other practices where accessibility may be an issue. A more accessible system and clear information on the accessibility of the system will hopefully illustrate to all the seriousness with which the University of Edinburgh 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?

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.

Disabled users using assistive technologies will have an expectation that those technologies should be compatible with the system. The system should be accessible to other groups requiring other accessibility features – e.g. font size, colours used, etc. Additionally, the system is only available in English but as English is the Main teaching language of the University and courses are offered in English we do not believe this will cause a disadvantage.

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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

Update 2016 – we have no evidence of 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, the system proved compatible with assistive technology and allows other accessibility features as described previously.

Update February 2016: No issues have been raised by any equality group in regards to accessing the system. We do not feel that any equality group has been 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?

We do not believe so. In fact it should help to remove some barriers. e.g. The system should allow students to participate in a session at distance where a teaching event is being streamed to the web or conducted entirely online. To ensure students on restricted income who are unable to afford their own devices are not excluded we will liaise with the Schools to ensure they set up discretionary funding to buy these students their own device to enable them to participate. However as the system is potentially available to all mobile phones through the use of SMS, it is hoped that this will only be required in a very few instances if at all.

Update February 2016: No issues have been raised by any other group in regards to barriers being created in trying to access the system nor has there been any issues raised by students regarding access to devices. We know of no cases where schools have been approached for funding for such a device although we are aware that some students may feel embarrassed about doing so and we will remind schools of the need to offer this if needed.

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 Officer will review the accessibility of the system for disabled users any time there is an upgrade. In addition, all feedback will be monitored to discover whether there is any positive or negative impact on any group with a protected characteristic.

Update 2016 – Any changes to the system will be reviewed for accessibility and feedback will continue to be monitored.

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.

Update 2016 – Option 1 – for the reasons detailed in the original EqIA and Update.

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

As per the answers above.

I Action and Monitoring

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

Publish advice for disabled users on the PRS section of our web pages. Provide materials in alternative formats on request. Liaise with the Schools to ensure they set up discretionary funding to allow students on low incomes the means to buy their own device to enable them to participate.

Update 2016 – we will continue to provide materials in alternative formats as requested and make reasonable adjustments as necessary.

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

The Educational Design and Engagement team and Information Services Helpline will monitor all feedback on the system from users on an on-going basis to discover any negative impact on any of the nine protected characteristics.

Update 2016 – Feedback in any form will continue to be monitored for any positive or negative impact on any of the 9 protected characteristics.

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

Update February 2016: When next upgraded or with any major changes to the current version.

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)): **Wesley Kerr, Educational Design and Engagement, Learning, Teaching and Web Services Division**
Update 2016 – Wesley Kerr, Educational Design and Engagement Learning, Teaching and Web Services Division

Accepted by (name): **Mark Wetton, Head of Educational Design and Engagement (LTW)**



Update 2016 – Jo Spiller, Head of Education Design and Engagement (LTW)

Date: 24/2/15 updated February 2016

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