



## 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.

A. Policy or Practice (name or brief description): <b>Transition of the University of Edinburgh's telephone system from analogue to VoIP.</b>
B. Reason for screening (delete as applicable): <ul style="list-style-type: none"><li>• <b>Proposed change to an existing policy/practice</b></li></ul>
C. Person responsible for the policy area or practice:  Name: <b>Chris Adie</b>  Job title: <b>Head, Communications Infrastructure Section, and Deputy Director, IT Infrastructure Division</b>  School/service/unit: <b>Information Services</b>
D. Screening Analysis  1. Does the policy or practice affect primary or high level functions of the University? <b>Yes</b> 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> 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>  If the answer to any of these questions is 'Yes', an EqIA should be carried out on the proposed/revised policy or practice at an early stage and in any event before it is finalised.
E. Screening outcome  Equality Impact Assessment required: <b>Yes</b>  Record notes about the screening process or outcome here. <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></ul> <b>The EqIA will be carried out by Eva Barrett, Business Administrator prior to the start of the Procurement tendering process (December 2014) and updated throughout the process.</b>
F. Sign-off  Screening undertaken by (name(s) and job title(s)): <b>Eva Barrett, Business Administrator, IT Infrastructure Division, University of Edinburgh.</b>  Accepted by (name): <b>Chris Adie, Head, Communications Infrastructure Section, and Deputy Director, IT Infrastructure Division, University of Edinburgh.</b>  [This will normally be the person responsible for the policy/practice named in C above. If not, specify job-title/role.]  Date: <b>17<sup>th</sup> November 2014</b>

If EqlA 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 EqlA 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 EqlA: in some circumstances - particularly for new policies/practices – there may be limited information on which to base EqlA. In these cases, the EqlA should be carried out to the extent possible and should identify arrangements for monitoring/investigation of equality impact and for fuller EqlA 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 EqlA should not be excessive.

- 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 EqlA)? On what aspects of equality does the policy/practice particularly impact?

**The University of Edinburgh is transitioning its telephone system from analogue to VoIP (Voice over Internet Protocol – technology which carries phone conversations over the data network). Currently, there are roughly 4,500 VoIP extensions managed through three NEC SV8500 VoIP exchanges, and about 6,000 analogue extensions running on five NEC/Philips Sopho iS3000 exchanges.**

**The rollout has so far been conducted on an opportunistic basis, using funding from estate development projects (new builds, major refurbishments etc). The University now recognises that continuing dependence on its analogue telephony estate is increasingly a risk to its business, due to ageing equipment becoming obsolete and unmaintainable. It is seeking to complete the rollout of VoIP technology such that the Sopho exchanges can be decommissioned. Funding for this will come from the Estates capital programme. From the user (staff and postgraduate students) perspective it is largely a like-for-like replacement, although there may be some relatively minor functional enhancements.**

**This project has the potential to have greatest impact on disabled users as the new system will need to be compatible with axillary aids such as hearing aids and be accessible for disabled users – such as suitable size keys or the ability to adapt the phone accordingly.**

- 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).

**Disability is the most relevant protected characteristic, with the greatest impact potentially being on people with auditory or visual impairments. In addition, the project will facilitate home working, which may improve the ability of care-givers (who are more likely to be female) to engage in the workplace remotely and may therefore have a potential positive effect on the protected characteristic of sex and also potential pregnancy and maternity because of the increased facilitation of home working. We do not envisage any potential positive or negative impact on any of the other protected characteristics**

- 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.

**A survey of phone users in January 2013 included a variety of questions with freeform answers, and a number of comments relevant to equality and diversity issues were received. Many of these comments related to auditory impairment,**

and requested that any new provision should provide volume control and/or enhancement, and induction/t-loop compatibility. Comments were also received about the need for phone access when away from the University (perhaps at home), and conversely about the need for a clear division between “home” and “work” lives. The need for high-quality audio to facilitate clear communication with individuals with strong accents was also mentioned.

As deployment of the new system proceeds, we will monitor the emergence of specific requirements related to any of the Protected Characteristics. These will either be satisfied immediately, or will be recorded for subsequent action. The Disability Information Officer for IS is involved in the procurement and all tenders for the VOIP phones were asked to complete a section on accessibility which was considered when awarding the contract.

- 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 believe that this policy will lead to any form of prohibited conduct. We have ensured that the tender process considers accessibility and reasonable adjustments are in place for disabled users.**

- Are reasonable adjustments built in where they may be needed?

**Yes -Staff who require specific handsets for a reason relating to their disability will be provided free of charge with an appropriate handset. All communication about the change to VOIP phones and instruction guides etc will be provided in alternative formats upon request.**

- Does the policy/practice contribute to advancing equality of opportunity<sup>1</sup>? 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 policy will take account of disabled user’s impairments by ensuring the standard model phone is as accessible as possible and that additional specialist phones are available on request. We do not believe that changing the telephone system will encourage increased participation as we already provided accessible handsets as required. The support for mobile users will provide greater opportunities for home working which will may encourage increased participation by care-givers (who are disproportionately female).**

- 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>2</sup>? Will it help to tackle prejudice and/or promote understanding?

**By ensuring the phones are as accessible as possible (with amplification and larger button versions available etc), users will see that the University places great value on accessibility and inclusivity of disabled users which will hopefully promote greater understanding amongst disabled and non-disabled users.**

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<sup>1</sup> This question does not apply to the protected characteristic of marriage or civil partnership

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

- 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?

**Disabled users even with the same disability are individuals and have different individual requirements based on how the impairment affects them and their individual coping strategies, however there is likely to be a general expectation that the phones will be accessible and include the ability to customise for specific disabilities i.e. compatibility with hearing aids, volume amplification, visual ring displays, large buttons etc.**

- 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 would envisage uptake to be similar amongst all the equality groups.**

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

**No.**

**The individual needs of specific disabled users will be addressed through ensuring the accessibility of the system in general during procurement and through the provision of specialist handsets as required at no cost to the user.**

- 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 policy should not create a barrier for any groups. It is hoped to offer the facility to use a smartphone on WiFi as though it were a University telephone extension. Postgraduates from lower income backgrounds may be disadvantaged if they are unable to afford smartphones. The University should identify programmes which offer financial support for postgraduate students from lower income backgrounds to enable them to buy smartphones. (Note that undergraduates typically do not use University internal phones.) If a disabled postgraduate requires a specific accessible phone this will be provided free of charge.**

**Where a disabled user requires a specific adjustment this will be provided and funded in the normal way (e.g. through the user's department or School) and the cost of an assistive handset will not be borne by the user. All communication about the policy will be provided in alternative formats upon request.**

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

**The Disability Information Officer for Information Services has prepared a list of questions regarding accessibility which were included as part of the tender document and reviewed the answers. Any feedback from phone users will be considered against the 9 protected characteristics to check there is no unexpected negative impact on equality and to look for any positive impact that has been reported. All phone users completed a survey in 2013 to highlight any potential issues and their feedback has been considered in this change.**

- 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.

**It should be clear to disabled staff and students that alternative phones that are suitable for their individual needs can be obtained and instructions on how to go about this must be clear and simple and that the University and not the disabled individual will bear the cost.**

#### **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.

**Included in Section G above.**

#### **I Action and Monitoring**

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

**Ensure disabled staff and students are aware they can request specific assistive phones if required at no cost to themselves. Ensure documents relating to phone use are available in alternative formats.**

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

**Any feedback from phone users will be considered against the 9 protected characteristics to check there is no unexpected negative impact on equality and to look for any positive impact that has been reported.**

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

**When any further changes to phone provision are made or if any negative feedback is received regarding any of the 9 protected characteristics in which case we will review the policy and the EqIA again in light of this.**

#### **J. Publication of EqIA**

EqIAs are published on the Equality and Diversity website.

There is a statutory requirement to publish EqIAs within a reasonable period. However, in some circumstances there may be valid reasons to limit what is published or to delay publication.

Can this EqIA be published in full, now? **Yes**

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)): **Eva Barrett, Business Administrator, IT Infrastructure Division, University of Edinburgh**

Accepted by (name): **Chris Adie, Head, Communications Infrastructure Section, and Deputy Director, IT Infrastructure Division**

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

Date: **23<sup>rd</sup> July 2015**

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